MSA FY 2025
easyJet Modern Slavery Act Transparency Statement
12 February 2026

Introduction

This statement is published in accordance with section 54 of the Modern Slavery Act 2015 (the "Act"). It summarises the actions taken during the financial year from 1 October 2024 to 30 September 2025 ("FY25") to prevent modern slavery across our operations. Modern slavery includes slavery, servitude, forced or compulsory labour, and human trafficking.

This statement relates to group companies within the easyJet Group, covering easyJet Airline Company Ltd (referred as "easyJet") and easyJet holidays Ltd (referred as "easyJet holidays").[1]

This statement will be uploaded to the UK Government's Modern Slavery Statement Registry and is accessible on our corporate website here – as well as all our previous statements.

We continue to build on the work carried out in previous years to identify modern slavery risks and strengthen preventative measures.

As required by section 54 of the Act, this statement outlines our:
1. Organisational structure and supply chain
2. Policies in relation to modern slavery
3. Due diligence processes in relation to modern slavery
4. Risk assessment and management
5. Effectiveness
6. Employee training and awareness on modern slavery

1. Organisational structure and supply chain

1.1 The easyJet Group business

During FY25, easyJet carried approximately 93.4 million passengers and operated a fleet of 356 aircraft across 1,202 routes, serving 163 airports in 37 countries. During that period, the Group employed around 19,000 people, with approximately 7.8% on seasonal contracts and 8.4% on fixed-term contracts.

[1] Further details of our subsidiaries and corporate structure can be found on p.188 of our Annual Report and Accounts 2025.

We have three operating airlines, in the UK, Austria and in Switzerland. Our main office is in the UK, but we also have employees across ten European countries, on contracts governed by those national laws. This attracts the best talent in those countries and ensures that our contracts reflect each of those country's employment practices.

We recognise 26 trade unions, 8 local works councils and maintain engagement through European Works Councils and other consultative bodies. Approximately 84.2% of our employees are covered by Collective Labour Agreements.

During FY25, easyJet holidays took c. 3.09 million customers on holiday across the easyJet network. easyJet holidays has continued developing long term strategic relationships with hotels (with a significant number of directly contracted hotels), destination management companies and trade/tourism boards. easyJet holidays clearly communicates with those suppliers its approach and expectations in relation to modern slavery.

As indicated in our FY24 Modern Slavery Statement, on 31 May 2024, easyJet acquired a maintenance, repair and overhaul facility in Malta, now named easyJet Engineering Malta Limited ("easyJet Engineering"). Following the acquisition, easyJet has successfully rolled out the easyJet Group Human Rights and Modern Slavery Policy at easyJet Engineering and delivered training to relevant employees to ensure awareness and compliance with these commitments.

1.2 The supply chain of the easyJet Group

easyJet has partnered with EcoVadis, a market-leading provider of business sustainability ratings, to assess suppliers' environmental, labour & human rights, ethics and sustainable procurement risks. Labour & human rights covers, among others, child labour, forced labour and human trafficking (i.e. modern slavery). This gives easyJet greater transparency in relation to its suppliers by helping it identify, prevent and mitigate sustainability risks in its supply chain.

easyJet has c.1,747 direct suppliers in EcoVadis (excluding hotel accommodation suppliers, as explained in the Section 4.3), which cover 140 industries and 51 countries. 45.45% of our tier one suppliers are based in the UK, 39.39% in the EU, and the remainder in the Americas,[2] Middle East and Africa.

Below is a mapping of the location and high-risk industries in which easyJet suppliers are based in, as part of our efforts to ensure supply chain transparency.

Location of Group suppliers

As shown below, 92.57% of easyJet suppliers are located within the UK, EU and the Americas.

- UK – 51.74%
- EU – 35.58%
- America – 5.25%
- Europe – Non EU –4.85%

[2] Covering this year United States, Canada and Brazil

- Africa: 1.03%
- Middle East: 0.91%
- Asia Pacific:0.63%

<u>High risk industries within easyJet's supplier base according to EcoVadis</u>

- Accommodation
- Building completion and finishing
- Cargo handling
- Construction of other civil engineering projects
- Construction of roads and railways
- Construction of utility projects
- Freight transport by road
- Human health activities
- Inland water transport
- Manufacture of air and spacecraft and related machinery
- Manufacture of basic chemicals, fertilizers and nitrogen compounds, plastics and synthetic rubber in primary forms
- Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
- Manufacture of coke and refined petroleum products
- Manufacture of communication equipment
- Manufacture of cutlery, hand tools and general hardware
- Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
- Manufacture of glass and glass products
- Manufacture of measuring, testing, navigating and control equipment; watches and clocks
- Manufacture of other electrical equipment
- Manufacture of other fabricated metal products n.e.c.
- Manufacture of other food products
- Manufacture of paints, varnishes and similar coatings, printing ink and mastics
- Manufacture of plastics products
- Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres
- Manufacture of soft drinks; production of mineral waters and other bottled waters
- Manufacture of structural metal products, tanks, reservoirs and steam generators
- Other manufacturing n.e.c.
- Sale of motor vehicles
- Treatment and coating of metals; machining

1.3 Governance

Oversight of our modern slavery programme rests with the Board's Audit Committee. Day-to-day implementation is managed by the Modern Slavery Working Group, comprising representatives from Legal, HR, Procurement, and Sustainability.

Board oversight

The Board sets the tone at the top, demonstrating our commitment to ethical behaviour and doing the right thing. Our Code of Business Ethics sets a clear behavioural framework, consisting of Safety First, Integrity, Avoidance of Conflicts of Interest, Compliance with Laws and Whistleblowing. "Be Safe" is also a core tenet of easyJet Group's behavioural framework for all of its people.

The Audit Committee receives an overview of whistleblowing cases every quarter, as part of the Internal Audit and SUSO reporting. Additionally, the entire Board reviews and approves the Modern Slavery Statement on an annual basis.

Management oversight

The Airline Management Board ("AMB") has a clear strategy for *'Making low-cost travel easy'* and winning for our customers, our shareholders and our people. As part of this strategy, our approach to modern slavery includes effective management oversight and a policy framework, as detailed below.

The Modern Slavery Working Group was established in 2016 and includes senior management from relevant functions across the business, including Legal, HR, Procurement, Sustainability, Cabin Crew, Ground Operations, Security, Risk & Assurance and easyJet holidays. The Working Group meets formally 4 times per year. There are also reviews throughout the year on the effectiveness of our Modern Slavery controls.

Our Business Integrity Committee works closely with the Modern Slavery Working Group and oversees our whistleblowing hotline for modern slavery, 'Speak Up, Speak Out' ("SUSO"), and our SUSO Policy. This committee is also responsible for identifying trends raised through SUSO and ensuring that appropriate action is taken to address any issues. As indicated above, an overview of these cases is presented to the Audit Committee.

2. Policies in relation to Modern Slavery

All of our policies are easily accessible in our internal intranet site and referred to in our mandatory trainings. Since 2022, we have also published our ethical policies on our external corporate website. You can access the policies of the easyJet Group here. easyJet holidays' policy framework and ethical standards are broadly aligned with those of easyJet and there is consistent implementation. This enables a clear communication of our processes both internally and externally to our suppliers.

Our own business

easyJet Group employees are required to adhere to the Human Rights and Modern Slavery Policy and the Code of Business Ethics, both of which easyJet reviewed during FY25 and considered appropriate. The Code clearly states "easyJet has a zero-tolerance approach to modern slavery

across all areas of the organisation and in its supply chain". Additionally, the easyJet Group has policies on non-discrimination, health and safety, anti-bribery and whistleblowing.

Our suppliers

The easyJet Group also has a Supplier Code of Conduct, setting the environmental, social and governance standards for doing business with the easyJet Group. These include ensuring fair treatment of employees, a respectful working environment; respect of human rights; and prohibition of any form of modern slavery or bribery. Our suppliers are also required to comply with the United Nations International Bill of Human Rights, the International Labour Organisation's Core Conventions and Declaration on Fundamental Principles and Rights at Work; and the United Nations Guiding Principles on Business and Human Rights. easyJet's Supplier Code of Conduct also provides suppliers access to its whistleblowing system, referred as the SUSO system.

2.1 Stakeholder engagement

Ecovadis

In 2024, easyJet initiated a supplier engagement journey, in collaboration with EcoVadis. Initially, the focus was on easyJet's key suppliers and those already registered on EcoVadis. In parallel, for suppliers yet to register with EcoVadis, easyJet began an engagement plan, focusing initially on the highest risk suppliers, to encourage registration and where applicable, obtaining greater insight into policies and procedures of various suppliers to support management of risks longer term. The suppliers flagged as the highest risk were reported to the Audit Committee in February 2025.

The Global Sustainable Tourism Council

Throughout FY25, easyJet holidays' Chief Operating Officer continued to be a member of the Global Sustainable Tourism Council (GSTC) Board. Further information on the role of the GSTC is set out below in Section 4.3 – Accommodation Suppliers.

UNICEF

We have continued our flagship partnership with UNICEF, fundraising for our 'Every Child Can Fly' campaign to support every child's right to education. Our partnership, first launched in 2012, has now raised more than £17 million for UNICEF and its life-saving programmes.

We have remained committed to supporting UNICEF's education programmes, with all the funds raised going to UNICEF to support its work in this area. UNICEF's target is to provide access to learning opportunities for 114 million out-of-school children and digital education for 149 million children around the world by the end of 2025. We have also supported their Children's Emergency Fund, as well as being a founding member of UNICEF UK's Emergency Alliance initiative. This means that funds raised on board our flights help UNICEF to respond immediately in an emergency, protecting children and families caught up in crises with whatever they need, be that life-saving therapeutic food, clean water and sanitation, temporary schools, health clinics, and so much more.

3. Our due diligence processes

We expect all our suppliers, partner organisations and their own supply chains to operate to the highest standards and share our values and respect for human rights.

The level of due diligence is adjusted based on whether the supplier has provided an EcoVadis scorecard (i.e. full assessment) or not. If the supplier has an EcoVadis scorecard, easyJet has a framework to review whether the risk level is adequate and if any additional controls or remediations are needed. For suppliers without an EcoVadis scorecard, easyJet's internal team has built a due diligence review process across the areas of Labour & Human Rights (covering modern slavery), Fraud & Ethics, and Environment. Below are the main controls easyJet has in place.

3.1 Supplier Code of Conduct

Our Supplier Code of Conduct has been incorporated into contracts with suppliers where applicable. For easyJet holidays, the Supplier Code of Conduct - along with information on whistleblowing - is included in contracts for accommodation, transport and ground handling services.

3.2 Standards per risk level

During the previous financial year, FY24, easyJet's Supply Chain Integrity Working Group set proportionate standards on Labour & Human Rights, Fraud & Ethics and Environment. The application of the standards is based on the risk level of the supplier (as set by EcoVadis) and is combined with minimum standards that apply to all suppliers.

3.3 Contract clauses

Where appropriate, our supplier agreements include modern slavery clauses. These clauses may include a requirement to comply with the Act, internationally recognised standards and easyJet's Supplier Code of Conduct or equivalent, information and notification rights, the right to conduct audits, access to SUSO and remediation rights.

3.4 Supplier Visits

Our Contact Management Centre Risk Team conducts formal modern slavery audits across all our Contact Centre service providers. The approach applies to all countries within which we have contact centres; and prioritises high-risk jurisdictions, where we ensure that onsite audits are conducted annually. For lower-risk locations, we perform onsite checks based on a matrix that determines an appropriate frequency of visits.

In FY25 the team did 15 on site visits to Contact Management Centres, covering all high-risk locations. During these visits, workers are randomly picked and questioned about their employment conditions, how they are recruited, the retention of their personal documents and the compensation for extra hours. Additionally, we hold forums for employees at all levels to voice concerns without management being present. These checks did not result in any concerns or risks regarding modern slavery.

4. Risk assessment and management

4.1 Our organisation

We have clear processes in place to deal with any report of a modern slavery incident in our Group activities and our supply chain. Reports can be raised in two main ways, via SUSO or via SafetyNet, our internal safety management system. Regarding SUSO, reports are triaged based on the

topic, including modern slavery. As highlighted in Section 1 - Governance, a member of the Risk & Assurance team responsible for SUSO, is part of the Modern Slavery Working Group. Hence, if any incidents occurred, they would raise it with the Chair of the Modern Slavery Working Group and an investigation plan would be put in place, in line with our SUSO policy. There have been two instances of reported incidents regarding modern slavery during FY25. See 5.4 – Suspected incidents for further information.

Regarding SafetyNet, these reports are raised by our crew and reviewed by the Safety Team. These reports may be passed on to enforcement agencies to investigate, as required by law. Where appropriate, easyJet may assist in the investigation. easyJet is regularly reviewing whether any changes can be made to improve its processes.

4.2 Our supply chain assessment

Through the EcoVadis platform, easyJet has identified its high-risk suppliers on Labour & Human Rights, which covers modern slavery.

easyJet currently has 127suppliers classified by EcoVadis IQ Plus[3] as medium high risk[4] on Labour & Human Rights and 7 suppliers classified as high risk.[5] All 7 high risk suppliers have either completed a risk treatment or undertaking completion. EcoVadis assesses supplier risk based on industry sector and country of operation. easyJet is now in the process of engaging its supplier base, focusing initially on the highest risk suppliers, to gain deeper insights into potential risks and how these can be addressed effectively.

4.3 Accommodation Suppliers

We continue to focus on the hotels offered by easyJet holidays, as part of our wider sustainability strategy, and the important role of globally recognised hotel certifications. Our Certified Sustainable range presents customers with the ability to select a hotel that has achieved a globally recognised certification. During FY24, all hotels within our Certified Sustainable Range achieved a certification by a Global Sustainable Travel Certificate (GSTC) or equivalent recognised certification body with human rights and modern slavery forming an integral part of the audits conducted by these bodies.

easyJet holidays is a member of GSTC and has committed to supporting the growth of globally recognised certifications in its hotel range. During FY25, easyJet holidays also set a stretch target at management level to monitor the growth in certified properties.

To further support easyJet holiday's mission of creating better holiday choices, easyJet Holidays has engaged UK travel agents on the importance of certified properties as lead partner of the Travel Trade Gazette (TTG), Fairer Travel Festival. UK travel agents have then had the opportunity to learn the skills required to discuss more sustainable holidays with their customers.

[3] IQ Plus is a tool from EcoVadis that leverages intelligence from the world's largest sustainability performance database, the company's own procurement data, direct supplier inputs, and screening of supplier-specific documents and risk factors. It does not entail a full supplier assessment as conducted with the EcoVadis scorecard.
[4] EcoVadis classifies as Medium High risk those suppliers where its country of operation and the industry in which it operates is likely to cause mild adverse effects, in this case on Labour & Human Rights. The company may need to be monitored to control its impacts.
[5] EcoVadis defines as High Risk those suppliers who are strongly exposed to Labour & Human Rights risks. Its country of operation and the industry in which it operates are likely to effects on Labour & Human Rights. The company should be considered a priority to mitigate its impacts.

In FY25 easyJet holidays continued to include the Group's Supplier Code of Conduct to all directly contracted hotel providers as part of its 'Hotel Manual'. The Hotel Manual sets out easyJet holidays' expectations around modern slavery. These expectations are that nobody working in the hotel, or its' supply chain is exploited or working against their will; that the hotel premises are not used for exploitation or trafficking; and that any instances of exploitation or trafficking are immediately reported to us.

5. Effectiveness

As a Group, we use a number of measures to assess the effectiveness of our modern slavery strategy, including the number of high-risk suppliers, the number of reported suspected incidents, the number of staff trained, non-compliance found through due diligence, the number of SUSO cases; and finally, the number of investigations carried out by our Security team relating to modern slavery. In FY25, we have refined our KPIs to measure progress towards our targets.

5.1 Suspected incidents

During FY25, we received two anonymous reports containing minor allegations potentially related to modern slavery within our supply chain. In line with our established processes, we requested the relevant suppliers to investigate the concerns and to provide appropriate documentation, responses and assurances. Following several rounds of clarification and review, we were satisfied that the suppliers had provided sufficient information to demonstrate that appropriate controls and safeguards were in place.

Regarding the flights we operate, our Cabin Crew reported 20 suspected human trafficking incidents. These incidents were identified by the crew and pilots (in accordance with company training and procedures) and the relevant enforcement authorities were informed and handled the investigations, as required by law. Where appropriate, easyJet assisted the enforcement authorities with their investigations. As far as easyJet is aware, none of these suspected cases were confirmed.

5.2 Investigations

Our Security and Data Protection teams continue to collaborate with the relevant authorities in various countries, and our Security team are engaged with Police Trafficking teams across easyJet's network. In FY25, the Data Protection team supported 12 requests for information from UK and European authorities in connection with human trafficking.

6. Modern Slavery training and awareness

We have continued to deliver a training programme specifically designed for our flight operations teams; and another to all employees within the Management & Administration (M&A) community of the easyJet Group.

6.1 Crew and pilot training

For all airlines and transport providers, there is a risk that their services may be used by human traffickers. We recognise that our cabin crew and pilots are in a position to identify, and report suspected cases.

Modern Slavery training has been revised and embedded into the online training programme for all cabin crew and pilots. This training is being completed on a rolling basis throughout FY26 (from October 2025 to September 2026), replacing the previous quarterly modules and aligning with

the schedule of all mandatory training. Until February 2025, the training was delivered to 1,577 new entrant cabin crew and 517 new entrant pilots, and by the end of FY26 the remaining cabin crew and pilots should have completed the Modern Slavery training.

The training continues to build awareness of modern slavery, with an emphasis on the trafficking of persons and equipping employees with the knowledge to identify and respond to potential cases. It includes practical case studies and sets out the appropriate actions to take where concerns are identified.

6.2 Management & Administration ("M&A") training

In FY24 we launched our new modern slavery mandatory training module, which includes case studies and an assessment. During FY25, 99% of the M&A new joiners completed the training.

Next steps

We will continue to assess the risk of modern slavery in our business and supply chain and how we address it. We will continue to seek feedback both internally and externally, and monitor our progress and find ways to further improve our processes and operational procedures to mitigate risks.

Kenton Jarvis
Chief Executive Officer
Approved by the Board on 12 February 2026