

easyJet Modern Slavery Act Transparency Statement

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the "Act"). It outlines the steps taken to combat modern slavery during the financial year starting 1 October 2023 and ending 30 September 2024 ("FY24"). Modern slavery describes all conduct which would constitute an offence under the Act. It includes slavery, servitude, forced or compulsory labour and human trafficking. The statement relates to group companies within the easyJet Group, covering easyJet Airline Company Limited (referred as "easyJet") and easyJet holidays Limited (referred as "easyJet holidays").¹

This is our ninth statement made under the Act and all previous statements can be found via [this](#) link.

We continue to build on the work previously undertaken to identify the risks of modern slavery and put in place preventative measures, as set out in previous statements.

In accordance with Section 54 of the Act, this statement sets out 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 FY24, easyJet carried 89.7million passengers and flew 333 aircraft on 1,099 routes to 160 airports across 35 countries. During that period, we also employed c. 18,000 employees across the easyJet Group (with around 6.7% of those employees on seasonal contracts and 2.5% on fixed term contracts).

¹ Further details of our subsidiaries and corporate structure can be found on p.202 of our Annual Report and Accounts 2024.

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 25 trade unions, 8 local works councils, 1 union informal body and 2 other consultation and information bodies, including European Work Councils. 83.9% of our employees are covered by Collective Labour Agreements.

During FY24, easyJet holidays took c. 2.3 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.

On 31 May 2024, we acquired a maintenance, repair and overhaul facility with approximately 350 employees in Malta, now named easyJet Engineering Malta Limited ("easyJet Engineering"). This means that easyJet now undertakes the heavy maintenance of some of its fleet in Malta. easyJet conducted due diligence into modern slavery risks pre-acquisition and made additional enquires once the company was acquired. Upon completion of these investigations, easyJet concluded that there were no material risks.

Going forward, easyJet plans to roll out the easyJet Group Human Rights and Modern Slavery Policy and its respective training at easyJet Engineering.

1.2 The supply chain of the easyJet Group

easyJet has now 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.1,600 direct suppliers (plus hotel accommodation suppliers, as explained in the Section 4.3), which cover 131 industries and 49 countries. Below is a mapping of the location and high-risk industries in which easyJet suppliers are based on, as part of our efforts to ensure supply chain transparency.

Location of Group suppliers

As shown below, 92% of easyJet suppliers are located within the UK, EU and the Americas.

- UK - 50.2%
- EU - 38.2%²
- America - 5.4%³
- Europe – Non EU - 4%⁴
- Middle East: 1.2%⁵
- Africa: 0.6%⁶
- Asia Pacific: 0.4%⁷

High-risk industries within easyJet's supplier base according to EcoVadis

- Building completion and finishing
- Construction of buildings
- Construction of other civil engineering projects
- Manufacture of consumer electronics
- Manufacture of domestic appliances
- Manufacture of electric components and boards
- Airport Services: covering Ground Operations.
- Manufacture of measuring, testing, navigating and control equipment watches and clocks
- Manufacture of optical instruments and photographic equipment
- Engineering: covering Aircraft Appearances and Logistics.
- Manufacture of other textiles
- Manufacture of wearing apparel
- Other passenger related transport
- Spinning, weaving and finishing of textiles

² Covering (in decreasing number) Germany, France, Italy, Netherlands, Spain, Austria, Ireland, Portugal, Croatia, Sweden, Belgium, Denmark, Greece, Poland, Malta, Bulgaria, Iceland, Czech Republic, Luxemburg, Finland, Hungary, Slovenia, Norway, Serbia, Albania, Estonia, Latvia, Lithuania, Montenegro.

³ Covering (in decreasing number) United States, Canada and Brazil

⁴ Covering Switzerland (the vast majority) and Gibraltar.

⁵ Covering Turkey, Cyprus, Israel, Jordan, United Arab Emirates. Turkey leads with 0.6%.

⁶ Covering Tunisia, Morocco, Egypt and South Africa

⁷ Covering Australia, India, China and Japan

1.3 Governance

- 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 risk and assurance 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 is responsible for the development and implementation of our Modern Slavery strategy. It 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 regular discussions throughout the year on the effectiveness of our Modern Slavery strategy.

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 on a quarterly basis.

Additionally, in FY2023 easyJet formed a cross-functional working group to map and review the existing controls around key Environmental, Social and Governance (ESG) risks regarding third parties, referred to as the Supply Chain Working Group. For such purpose, they engaged external advisors to prepare an implementation roadmap on third party risk management. This Working Group meets regularly to review the implementation of easyJet's third party risk management strategy, which covers modern slavery.

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 plc - Sustainability - Policies](#)

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](#), which easyJet reviewed during FY24 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 Global Sustainable Tourism Council

Throughout FY24, easyJet holidays' Chief Operating Officer continued to be a member of the Global Sustainable Tourism Council (GSTC) Board, achieving re-election in August 2024. Further information on the role of the GSTC is set out below in Section 4.3 – Accommodation Suppliers.

UNICEF

easyJet has partnered with UNICEF for over 12 years, supporting a variety of projects and raising over £17m for the charity. In FY24, easyJet renewed its partnership with UNICEF and created its Every Child Can Fly campaign, supporting every child's right to education around the world. Under its relaunched partnership easyJet's focus is supporting UNICEF's Education programmes, with all the funds raised going to UNICEF to support their work in this area. UNICEF's target is to provide access to learning opportunities for 114 million children and digital education for 148.6 million children around the world by the end of 2025.

3. Our due diligence processes

As indicated above, during FY24 easyJet had approximately 1,600 direct suppliers (plus hotel accommodation suppliers, as explained in Section 4.3), as well as a large indirect supply chain. 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 currently being developed and 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 is in the process of establishing 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 is working to build and refine 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 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 FY24 the team did 13 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 no instances of reported incidents regarding modern slavery during FY24. 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

In FY23 easyJet formed the Supply Chain Working Group and engaged external advisors to prepare an implementation roadmap on third party risk management. During FY24, easyJet continued with the implementation of the recommendations therein. The engagement of EcoVadis and the process described in Section 3 - Due diligence process, are part of the implementation process.

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

easyJet currently has 70 suppliers classified by EcoVadis IQ Plus⁸ as medium high risk⁹ on Labour & Human Rights and 6 suppliers classified as high-risk.¹⁰ 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) recognised certification body.

One such certification body is Travelife - a leading training, management and certification initiative for tourism companies committed to sustainability. Human rights and Modern Slavery form part of the audits conducted by Travelife (and other certification bodies recognised by GSTC). In direct contracts with accommodation suppliers, easyJet holidays encourages hotels to obtain and maintain Travelife Gold certification (or from another GSTC recognised certification body).

easyJet holidays is a member of GSTC and has committed to supporting the growth of globally recognised certifications in its hotel range. During FY24, easyJet holidays also introduced a management level KPI to monitor the growth in certified properties.

To further support easyJet holiday's mission of creating better holiday choices, it 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.

⁸ 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.

⁹ 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.

¹⁰ 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.

As the regulatory landscape continues to evolve, easyJet holidays monitors the certification landscape and, where appropriate, may choose to accept additional certifications or equivalent assurance that recognise our hotel suppliers' compliance with modern slavery and human rights standards.

In FY24, easyJet holidays also included 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 will also seek to set clear KPIs to measure progress towards our targets.

5.1 Supplier Directory

During FY24, easyJet made considerable progress in enhancing the supplier profiles in its central contract database and ensuring supplier contracts are uploaded on its supplier directory where applicable and appropriate.

5.2 Suspected incidents

In FY24, we did not receive any reports of modern slavery in our supply chain. Regarding the flights we operate, our Cabin Crew reported 16 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 handed the investigation, 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.

5.3 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 FY24, the Data Protection team supported 10 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.

During FY24, the training was delivered to c.9,200 existing cabin crew and 1,200 entrant cabin crew. It was also delivered to c.4,060 existing pilots and c.400 new pilots during that period. The training has continued to raise awareness of modern slavery, with a specific focus on trafficking of persons, and providing knowledge on how to detect and manage cases of modern slavery. The training contains case study examples and explains the actions to be taken if concerns arise.

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 FY24, 98% of the M&A new joiners completed the training.

Additionally, in May 2024, after our last Modern Slavery Annual Statement was published, we promoted awareness of modern slavery with an article in our 'Weekly News' to our M&A community. The article included an internal podcast on modern slavery.

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. During FY25, we will put particular focus on continuing to integrate easyJet Engineering, enhancing our internal training, setting KPIs and implementing our third party risk management strategy.

Kenton Jarvis

Chief Executive Officer

Approved by the Board on 12 February 2025