

easyJet Modern Slavery Act Transparency Statement

31st March 2019

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps taken by easyJet during the financial year ending 30 September 2018 to ensure that Modern Slavery is not taking place in any part of its business and supply chain.

“Modern Slavery” is used as an umbrella term to account for all conducts which constitute an offence under the Act. It comprises slavery, servitude, forced or compulsory labour and human trafficking.

This is our third statement made under the Act. Our previous statements can be found via the following link <http://corporate.easyjet.com/corporate-responsibility/modern-slavery-act-statement>.

About easyJet – Organisational structure

easyJet carries nearly 90 million passengers annually and flies 317 aircraft on more than 1000 routes to over 156 airports across 34 countries. As at 31 January 2019 we employed just over 14,000 employees across the group. Nearly 14,000 are employed on permanent employment contracts across our group; just over 300 are employed on fixed term contracts and we have just over 100 employees on seasonal employment contracts (these contracts are mainly in Spain, where we have a base that is only operational during the summer season and those crew are employed on a permanent but seasonal basis).

We employ people on contracts in eight countries across Europe, governed by the national laws of those countries. We do this so that our roles are attractive in those countries and to reflect each country’s employment practices. Our group headquarters are in the United Kingdom.

We recognise 24 Trade Unions across the group as well as 5 Works Councils, a European Works Council and various other employee consultation groups. These representative bodies cover the entire employee workforce with the exception of our most senior management teams. Our pilot, cabin crew and engineering workforces account for around 90% of the overall workforce and we recognise trade unions for all of these populations.

easyJet has three operating airlines; one in Austria, one in the UK and one in Switzerland. Further details of easyJet’s subsidiaries and corporate structure can be found in our Annual Report.

Our policies in relation to Modern Slavery

As part of our commitment to responsible business, we have in place policies to support recognised human rights principles.

We have a specific policy on Human Rights and Modern Slavery, approved by our Board of Directors, that applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners. This policy requires all our staff to act ethically and with integrity in all our dealings and relationships and to implement effective systems and controls to manage human rights and modern slavery. Our staff should also ensure that the suppliers and third parties they work with on easyJet’s behalf observe the principles set out in the policy. Any suspected breach of the policy should be reported, either to the employee’s line manager or to the legal team, or through the confidential reporting

mechanism detailed in our Whistleblowing Policy. The policy does encourage openness and guarantees support to anyone who raises genuine concerns in good faith under the policy.

We may start disciplinary actions against employees, or terminate our relationship with any individuals and organisations working on our behalf, if they do not observe the principles set out in our Human Rights and Modern Slavery Policy.

Our policies and working practices seek to respect the human rights standards set out in the International Bill of Human Rights. easyJet observes the principles set out by the International Labour Organisation Declaration on Fundamental Principles and Rights at Work (the 'ILO Declaration')

We also have in place a number of other policies to support recognised human-rights principles. These include policies on non-discrimination, health and safety, anti-bribery and environmental issues. easyJet also maintains a zero tolerance approach to bribery and corruption.

We continue to manage the risk of Modern Slavery in our business and supply chain. In this financial year, we have consolidated and updated our customer and employee values and behaviours, which is now called "Our Promise". Our promise is to be "safe and responsible" and is detailed in a number of related policies in the context of operational safety, occupational safety, security and compliance. Safety and security of our customers and people continue to underpin everything we do, supported by a strong reporting culture. All our employees, stakeholders and suppliers are strongly encouraged to speak-up and raise any concerns they may have, also in relation to human rights and modern slavery, as detailed in our Human Rights and Modern Slavery policy. Free confidential lines are available to all our employees and a number of key suppliers, as detailed in our Whistleblowing policy. Employees are required to complete an annual anti-fraud mandatory training module which includes reference to the whistleblowing hotline and how any unethical behaviour should be reported. In addition, recurrent crew training includes reference to the whistleblowing hotline and examples of unethical behaviour.

We recognise that improving risk management in respect of Modern Slavery is a continuous process. This process is led by senior management representatives from relevant functions across the business, including Legal and Compliance, the People Team, Procurement, Corporate Social Responsibility (CSR), Finance, Operations, IT, Security, Engineering and Commercial. These representatives continue to monitor and assess the effectiveness of the steps we are taking and issue recommendations on the areas for improvement in addressing Modern Slavery.

Building on the experience gained over the past three years, in 2019 we will continue to review our policies relating to staff training and increasing awareness of Modern Slavery, to ensure that we keep mitigating and managing the risks of Modern Slavery in a consistent and effective manner.

This review will be part of a wider project having as its object the revision and consolidation of our entire policy and procedure framework, including our Code of Ethics and Reporting Concerns procedures, the Safety, Security and Compliance Policies, the Central Procurement Policies (e.g. the Supplier Code of Conduct) and the Fraud, Bribery and Corruption policies. In all these areas, we are reviewing the existing policies and procedures to identify potential gaps, overlaps and opportunities for consolidation.

This wider project is being led by our Risk & Assurance team with the active participation of our Legal and Compliance, Procurement, CSR, Cosec and People teams. We intend to ensure that all easyJet's policies and procedures are up to date with laws and industry's best practices, interconnected, consistent and that appropriate coordinated action is

taken throughout the business. To this end, we have also created a dedicated and centralised intranet page where the new framework will be easily accessible by all personnel. Also, we are looking to tighten the mechanisms by which compliance with standards and policies is monitored and assessed in our organisation and supply chain.

Our due diligence processes

easyJet engaged with more than 1600 direct suppliers during the financial year and also has a large indirect supply chain. We require all supplier and partner organisations we work with to operate to the highest standards, both internally and in managing their own supply chains, and to share our values and respect for human rights.

All of our supplier contracts include a clause requiring compliance by the supplier, its subcontractors, its suppliers, with internationally recognised standards relating to human rights, as well as compliance with the Act and all other applicable anti-slavery and human trafficking laws and regulations. We also include more detailed Modern Slavery Act compliance clauses in supplier contracts, where appropriate, using a risk-based approach which specifically takes into account the geographical area and industry in which the supplier operates. These clauses enable easyJet to audit the supplier and its subcontractors' premises, take copies of the supplier and its subcontractors' records and interview the supplier and its subcontractors' personnel. The supplier is required to notify easyJet immediately upon becoming aware of any actual or potential breach of these clauses. In case of breach, easyJet would take action as appropriate, which may include working with the supplier to resolve the issue and could result in termination, should the breach be considered to be irremediable.

easyJet has a Supplier Code of Conduct which requires all suppliers to comply with (and to ensure that their sub-contractors comply with) a number of social and environmental principles including ensuring fair treatment of employees and a respectful working environment, no breach of human rights including no forced labour, and no bribery or corruption. This Supplier Code of Conduct also expressly prohibits Modern Slavery.

Our Risk assessment and management

easyJet provides air travel predominantly in countries with established employment and human rights standards.

We continue to monitor and assess easyJet's supply chain based on the factors that tend to be associated with higher Modern Slavery risk, such as certain geographic areas and industries, particularly those with lower labour costs (e.g. textiles, electronics, road transport and food and cleaning services).

We have not received any reports of a Modern Slavery incident in our supply chain. Our Cabin Crew reported a suspected human trafficking incident in 2018. In that case, the local competent Authorities were notified in accordance with the human trafficking section of our Cabin Crew training module and the Authorities investigated the case before concluding that no further action was required.

As an embedded part of our procurement policy and process, we continue to risk assess our supplier list and, as a result, this year will be preparing to send due diligence questionnaires to the suppliers that have become either high spend or have been added to the potentially higher risk category. The categories of goods and services we view as higher risk have not changed and include, for example, suppliers of uniforms, aircraft headrest covers and carpets, wiring looms used in the manufacture of aircraft, inflight food and beverages, hotel capacity providers, cleaners of aircraft, hotels and hire cars, taxi / shuttle transportation companies and IT and contact centre services.

Over the next year we will assess the effectiveness of our approach, including by taking into account feedback from suppliers and our supplier relationship managers. We will then

review and further develop the way in which we conduct supplier due diligence in the following years.

Modern Slavery training

Building on the programme we established in 2016, we continue to deliver targeted training designed to meet the level of knowledge required by their role to management staff that are in a position to identify Modern Slavery risks in the supply chain and operations.

All our staff are encouraged to discuss any concerns they may have in relation to Modern Slavery with their line manager and ultimately the Group Head of Legal and Compliance.

With specific regard to human trafficking, for all airlines and other transport providers, there is a risk that their services may be used by human traffickers. We recognise that our Cabin Crew and Ground Staff can be in a position to identify and report suspected cases and we train them accordingly.

More specifically, with regard to our Ground Staff, our Ground Handling Manual, which is incorporated in all our ground handling contracts and which our Ground Staff are required to comply with at all times, specifically addresses Modern Slavery and sets out the process to report suspected cases. A Home Office e-learning module is also available to our Ground Staff.

With regard to Cabin Crew, along with the specific training provided to all new starters, recurrent training is rolled out so as to maintain awareness and knowledge of the issue and to ensure that they keep looking out for signs of human trafficking on-board the aircraft. The training provides an overview of trafficking in persons, including case study examples, as well as procedures related to recognising and reporting suspected cases. The training is produced in collaboration with our Legal team and Security team.

Alongside providing internal training and guidance, our Security team collaborates with the Authorities of various Countries. The team are engaged with Police Trafficking Teams across easyJet's network and support their investigations. In 2018, the Security team supported investigations in Germany, France, Italy, the Netherlands, Spain and the UK.

We will continue to assess the risk of Modern Slavery in easyJet's business and how we address this. Based on internal and external feedback, we will continue to monitor our progress and find ways to further improve our processes and operational procedures to mitigate the risks.

Daud Khan

Company Secretary and Group General Counsel

Approved by the Board of easyJet plc on 21st March 2019

31st March 2019

This third statement has been made by the easyJet group, that is easyJet plc and its airline subsidiary businesses, easyJet Airline Company Limited, easyJet Europe Airline GmbH, easyJet Switzerland S.A and easyJet UK Limited. 'easyJet' means this group of companies. It has been approved by the Boards of Directors of easyJet plc and easyJet Airline Company Limited and signed by Daud Khan; Daud is the appointed sponsor of Modern Slavery Act compliance and the easyJet Company Secretary and Group General Counsel.