

easyJet Modern Slavery Act Statement

Amended and Restated on 31st March 2018

About easyJet- Organisational Structure

easyJet carries over 81 million passengers annually and flies over 280 aircraft on more than 890 routes to over 140 airports across 31 countries. We employ over 12,000 people and have crew based in the UK, Switzerland, France, Germany, Italy, Spain, Portugal and The Netherlands. Our company headquarters are in the United Kingdom.

easyJet has three aircraft operating businesses; one in the UK, one in Austria and one in Switzerland. Our organisational structure will secure our existing flying operations in the EU after Brexit. In December 2017 easyJet acquired a number of assets from Air Berlin, further expanding our fleet and flying network in Germany. Further details of easyJet's subsidiaries and corporate structure can be found in our [Annual Report](#).

Our commitment to human rights and our people

easyJet is committed to human rights, both in its business and its supply chain. This includes observance of the principles set out by the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

Both our Code of Ethics and Commitment on Human Rights (which we updated last year in response to the introduction of the Modern Slavery Act) are available to employees on our internal intranet and form an established part of how we do business. We also have in place a number of other policies which support recognised human-rights principles. These include policies on non-discrimination, health and safety, whistleblowing and anti-bribery and corruption.

As part of our commitment to gender equality, we established our Amy Johnson Initiative in 2015 to encourage more women to consider a career as a pilot.

We also work in partnership with trade unions in the eight countries where our employees are based, as well as through our national and European Works Councils.

Modern slavery policy

As defined by the UK Government, "modern slavery" includes slavery, servitude, forced and compulsory labour (including child labour amounting to modern slavery) and human trafficking.

easyJet continues to manage the risk of modern slavery in its supply chain. This is our second statement as required by the UK Modern Slavery Act 2015.

We recognise that improving risk management in respect of modern slavery will be a continuous process. This process is being led by our modern slavery working group who will continue to review the effectiveness of the actions we are taking. Continuing with the work we started last year, we will also continue to engage with our charity partner Unicef to assist us with the process. We intend to publish an update to this statement annually and comment on the progress made in respect of the actions identified in the previous statement and our plans for managing modern slavery risk in the following year.

Below we set out further detail of the areas of the business where there is scope for greater risk of modern slavery and explain how easyJet continues to manage these risks.

Supply chain

easyJet engaged with more than 1700 suppliers during our last financial year and has a large indirect supply chain too. 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.

Assessing and Managing Risk

easyJet provides air travel predominantly in countries with established employment and human rights standards. We therefore operate with a relatively low risk of modern slavery compared with many non-European based airlines or airlines with wider international networks. We use aviation products which by necessity are manufactured to the highest standards, undergo rigorous testing and are generally produced in high-standard environments in accordance with the requirements of aviation safety regulation.

In 2016 easyJet established a modern slavery working group with representatives from across the business, including Legal and Compliance, the People Team, Procurement, CSR, Finance, Operations, IT, Engineering and Commercial. Together the working group assessed 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).

On reviewing our risk of modern slavery in our operation, we have again had no reports of any incident in our supply chain (or of any human trafficking offence). We have revisited last year's risk assessment of the areas of easyJet's operations and supply chain most at risk and have found that the underlying risk profile has not changed this year. Due to the expansion of our operations in Germany, we have added another call centre and some further ground handlers to our list of suppliers, requiring enhanced due diligence in respect of modern slavery, due to the scale and significance of their services to easyJet.

Action being taken

1. Update on Due Diligence Questionnaire on labour practices for largest and higher risk suppliers

We focussed our first supplier due diligence questionnaire on 60 suppliers, made up of those which could be of higher risk based on the risk assessment criteria described above, and those with which easyJet has the highest spend. This year we have revisited our targeted supplier list and as a result this year will be sending due diligence questionnaires to a further dozen suppliers that have become either high spend or have been added to the potentially higher risk category this year. Most of the new additions are a result of the Air Berlin acquisition, as described above. The categories of goods and services we view as higher risk have not changed and include 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.

In responding to the questionnaire, suppliers have provided us with further information on the potential slavery and human trafficking risks that exist in their business and supply chain, and the policies and processes that they are using to detect and address those risks. None of the responses flagged any particular areas of risk over and above those identified in easyJet's own risk assessment; the process has however helped us to gain a deeper understanding of the modern slavery and human rights policies and processes of these suppliers.

We have not had to take any action (termination of contract or otherwise) against any supplier as a result of the findings of the modern slavery questionnaire or otherwise in relation to modern slavery in this past year.

In reviewing the effectiveness of our approach to the questionnaire we have decided to introduce a prioritisation process for introducing a new supplier into our operation by requiring that new or renewing suppliers answer key questions. These initial answers will allow us to determine whether follow up with a questionnaire (or other enhanced due diligence approach) is required. This change in process will be part of a wider supplier due diligence review being undertaken this year by our Head of Procurement.

Over the next year we will further assess the effectiveness of this approach, including by taking into account feedback from suppliers and supplier relationship managers. We will then review and, if necessary, further develop the way in which we conduct modern slavery supplier due diligence in the following years.

2. Supplier Code of Conduct and Contract Clauses

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 was reviewed in the light of the requirements of the Modern Slavery Act so that it now also expressly prohibits modern slavery and human trafficking.

Most negotiated supplier contracts already include a clause requiring compliance with internationally recognised standards relating to human rights. We have begun to include more comprehensive modern slavery compliance clauses in supplier contracts where appropriate, using a risk based approach.

3. Modern slavery awareness training

In 2016 we initiated a programme of further training of management staff who are in a position to identify modern slavery risks in the supply chain and operations, to promote further transparency and improvements in managing these risks. Our central procurement team previously had training specifically to raise their awareness and understanding of modern slavery. This year our legal team and certain contract managers managing higher risk areas in the supply chain will receive further training. We have procured a new online training module covering modern slavery and have added this to our learning library, enabling access by all management and administrative staff. We will measure participation in this new course as a key performance indicator.

Human trafficking

For all airlines and other transport providers, there is a risk that their services may be used by human traffickers.

Our security team continues to work closely with relevant authorities across Europe to help to prevent human trafficking. We know that our crew and ground staff can look out for signs of human trafficking and we have recently provided further guidance to all crew via our internal social network on how to recognise behaviours that could indicate human trafficking. Crew trainers continue to receive regular training from our security team on the risk of human trafficking in flight operations.

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 each year and find ways to further improve our processes and operational procedures to mitigate the risks.



Kyla Mullins

**Company Secretary and Group General Counsel
Approved by the Board of easyJet plc on 19th March 2018**

31st March 2018

This second 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 and easyJet Switzerland S.A. 'easyJet' means this group of companies. It has been approved by the Board of Directors of easyJet plc and signed by Kyla Mullins; Kyla is the appointed sponsor of Modern Slavery Act compliance and the easyJet Company Secretary and Group General Counsel.