

easyJet statement for the Modern Slavery Act

31 March 2017

About easyJet

easyJet carries over 70 million passengers annually and flies over 250 aircraft on more than 800 routes to over 130 airports across 31 countries. We employ over 10,000 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 two aircraft operating businesses; one in the UK and one in Switzerland. We recently announced our intention to apply for a third Aircraft Operator's Certificate and Operating Licence in the EU in order to secure our existing flying operations after Brexit. We recently announced our intention to apply for a third Aircraft Operator's Certificate and Operating Licence in the EU in order to secure our existing flying operations after the UK's exit from the EU. Further details of easyJet's subsidiaries and corporate structure can be found in our [Annual Report](#).

Our commitment to human rights

easyJet is committed to human rights. Our Code of Ethics and Commitment on Human Rights are an established part of how we do business. This includes observance of the principles set out by the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. 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.

We welcome the introduction of the UK Modern Slavery Act 2015. We have amended easyJet's Human Rights Policy so that it includes enhanced provisions in relation to slavery and human trafficking.

As defined by the UK Government, "modern slavery" includes slavery, servitude, forced and compulsory labour and human trafficking.

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

We are not aware of modern slavery taking place in our supply chain. However, we have identified the areas of easyJet's operations and supply chain most at risk and in this statement we set out how easyJet is already managing these risks.

We recognise that improving risk management in this area will be a continuous process. This process is being led by a group of easyJet managers who will regularly review the effectiveness of the actions we are taking and we are engaging with certain not-for-profit organisations to assist us with the process. We shall publish an update to this statement annually in which we shall comment on the progress made in respect of the actions identified in this statement and our plans for managing modern slavery risk in the following year.

Supply chain

Our supplier network includes over 8,000 suppliers and we have a large indirect supply chain too. For example, easyJet's aircraft supplier Airbus has a supply chain of around 7,700 suppliers.

easyJet established a 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 group assessed our 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).

Action being taken

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

We have initially focussed our supplier due diligence on 60 suppliers, made up of those which could be of higher risk based on the risk assessment described above, and those with which easyJet has the highest spend. Together this group of suppliers make up more than half of easyJet's supplier spending. The first category includes 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.

We have asked these 60 suppliers to complete a questionnaire. The questionnaire requires suppliers to provide us with information on the potential slavery and human trafficking risks that exist in their business and supply chain, and the steps that they are taking to detect and address those risks. The supplier questionnaire will also form part of procurement's process for bringing in new suppliers, where appropriate. We ask that the questionnaire is signed by a director (or equivalent legal officer) of the supplier. Any supplier which does not meet the standards we expect will be asked to take action to address this.

Over the next year we will assess the effectiveness of this questionnaire, 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. Strengthened contractual requirements for suppliers

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

Key supplier contracts already include a clause requiring compliance with internationally recognised standards relating to human rights. This clause has now been updated to set out

enhanced contractual expectations of the supplier in respect of working practices principles, including expressly prohibiting the use by the supplier (or their subcontractors) of modern slavery in their business. This revised clause will be included in new and renewed key supplier contracts whenever possible.

3. Modern slavery awareness training

We have 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 has undertaken training specifically to raise their awareness and supplier relationship managers of higher risk suppliers will also receive training. We will measure training participation 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 already works closely with the relevant authorities across Europe to help prevent human trafficking, as well as assisting these authorities with investigations relating to passengers. Our crew and ground staff can also help to prevent human trafficking. Over the next year we will introduce enhanced training for crew and ground staff on human trafficking and how to recognise behaviours that could indicate human trafficking. This will form part of initial and ongoing training for crew.

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, as well as further due diligence, we will further strengthen our processes and operational procedures. In our next annual statement we will provide an update on both existing and new measures easyJet is taking to manage the risks of modern slavery.

Kyla Mullins
Company Secretary and Group General Counsel

31 March 2017

This statement has been made by the easyJet group, that is easyJet plc and its airline subsidiary businesses, easyJet Airline Company Limited and easyJet Switzerland. '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 MSA compliance and the easyJet Company Secretary and Group General Counsel.