

easyJet Modern Slavery Act Transparency Statement

31st March 2020

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 2019 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 fourth 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>.

In accordance with section 54 of the Act, in this statement we talk about:

- I. Our organisational structure
- II. Our policies in relation to Modern Slavery
- III. Our due diligence processes in relation to Modern Slavery
- IV. The way we assess and manage Modern Slavery risks in our organisation and supply chain
- V. Our effectiveness in ensuring that Modern Slavery is not taking place in our business or supply chain
- VI. The training about Modern Slavery available to our staff

I. About easyJet – Organisational structure

easyJet carries more than 100 million passengers and flies over 334 aircraft on more than 1000 routes to 159 airports across 36 countries.

As at 31 December 2019, we employed more than 15,000 employees across the group. Most are employed on permanent employment contracts with around 280 employed on fixed term contracts and just over 10 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 nine 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 23 trade unions, 1 European Works Council, 5 local Works Councils and 4 other employee representative bodies. 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 roughly 87% 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. This statement only covers the easyJet airline business, as easyJet Holidays was not launched in this financial year.

II. Our policies in relation to Modern Slavery

The Airline Management Board (“AMB”) set a tone at the top that demonstrates easyJet’s commitment to integrity, ethical behaviour and doing the right thing.

In particular, the AMB set up a clear plan to take the company forward, consisting of five promises which express what we stand for, what we value and how we behave. The first promise is to be “safe and responsible” by making ethical decisions and acting in a safe and responsible way.

➤ The Modern Slavery Working Group and the Business Integrity Committee

Building on this promise, the Modern Slavery Working Group is responsible for the development and implementation of our Modern Slavery strategy. The Working Group was established in 2016 and is composed of senior management representatives from relevant functions across the business, including the Legal team, the People Team, Procurement, Corporate Social Responsibility (CSR), Cabin Crew Operations, Crew Training, Ground Operations, Security and Commercial. These representatives meet quarterly on a formal basis and more regularly to 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.

In addition, this year saw the establishment of a Business Integrity Committee to oversee the whistleblowing process and identify cross-company trends raised through the whistleblowing process, as well as other routes, and ensure appropriate action has been taken by management.

➤ Our policies

As reported in our previous statements, we have in place policies to support recognised human rights principles. These include a specific policy on Human Rights and Modern Slavery, as well as policies on non-discrimination, health and safety, anti-bribery and whistleblowing. Further details of easyJet policies can be found in our previous transparency statements.

All our ethical policies are available in a dedicated and centralised intranet page called “Compass (Ethics and compliance policies)”, which is easily accessible by all personnel.

As part of our continuous improvement process, this year we reviewed and updated the Human Rights and Modern Slavery clauses included in our Supplier Code of Conduct and revised our Whistleblowing policy.

Our Supplier Code of Conduct 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. The new clauses specifically require suppliers to respect internationally recognised human rights, including those expressed in the United Nations International Bill of Human Rights, and the internationally recognised rights and principles set out in the International Labour Organisation’s Core Conventions and Declaration on Fundamental Principles and Rights at Work. By agreeing to comply with the Code, our suppliers also commit to conduct their business consistently with the United Nations Guiding Principles on Business and Human Rights, to not employ or use any form of child, forced, bonded or compulsory labour and to strictly prohibit any form of slavery or human trafficking in their operations and supply chain. Our suppliers are also required to have at all times a written policy in relation to such matters and to ensure the policy’s effective implementation within their organisation.

As regards our Whistleblowing policy, a project was undertaken in 2019 in conjunction with the AMB, key functions and works councils to thoroughly review and refresh the policy, related investigation templates and reporting framework. The new whistleblowing policy includes a ‘Q&A’ section to address common concerns and greater transparency over

investigation timescales and the triage process. In addition, we are trialling a process in some countries where concerns, including those related to Modern Slavery, can additionally be reported directly through the Internet or a mobile App. These offerings will be rolled out to all remaining countries in 2020.

➤ Stakeholders engagement

This year we consulted with a number of expert stakeholders, such as not for profit organisations and investors, in developing our strategy to tackle Modern Slavery. We shared with them our Modern Slavery policy and strategy and their constructive feedback helped us to further improve our approach to tackling the issue.

In addition, in 2019 we participated in the roundtable organised by the British Institute of International and Comparative Law on the proposal by the UK Joint Committee on Human Rights 2017 for a failure to prevent mechanism for corporate human rights abuses.

III. 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.

➤ Supplier Code of Conduct

As mentioned above, easyJet has a Supplier Code of Conduct which was reviewed and updated this year.

➤ Contract clauses

In addition, all of our supplier contracts include a clause requiring compliance by the supplier, its subcontractors and 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 continue to 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 (as detailed in the risk assessment section below).

These clauses oblige the supplier to submit an annual slavery and human trafficking report setting out the steps they have taken to ensure that slavery and human trafficking is not taking place in any of their supply chains or in any part of their business. The clauses also 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.

➤ Modern Slavery questionnaire

Further, prospective suppliers deemed to pose a higher risk from a Modern Slavery perspective are required to complete a due diligence Modern Slavery Questionnaire before contracting with easyJet.

The questionnaire was reviewed and updated this year and consists of twenty-two questions designed to allow the suppliers to comment accurately on the potential modern slavery risks in their business and supply chain and the steps they are taking to detect and address those risks, as well as to identify what further action the supplier may need to take in the future. Any specific risk identified through the supplier's responses to the

questionnaire is addressed directly with the supplier either contractually and/or through further due diligence, as appropriate.

IV. Our Risk assessment and management

This year we reviewed and updated our Modern Slavery risk assessment both in our organisation and in our supply chain.

➤ Our organisation

Modern Slavery was included as a key topic in this year's Safeguarding Workshop – an internal cross-functional workshop aimed at assessing safeguarding risks faced by easyJet to stimulate discussion and prioritise any future management action. This was achieved through a two-step process: the completion of an impact assessment which considered the business and stakeholder impact, followed by the facilitation of a workshop in which the control and process environment of key safeguarding groups was assessed.

Excellent engagement was achieved from the business and the discussion highlighted that whilst we progressed in many areas, there still remains the need to further develop, and communicate, a framework across the company in which suspected Modern Slavery activity can be identified and reported in a consistent manner. This was reported back to the AMB and then to the Modern Slavery Working Group for appropriate follow-up action. In particular, to ensure greater knowledge of the Human Rights and Modern Slavery policy and the process for reporting suspected incidents. Next year we will communicate the policy and procedure further to the company.

➤ Our supply chain

This year we also reviewed our entire supply chain to continue to improve our understanding of where Modern Slavery risks lie and check that nothing materially changed from the previous risk assessments. We produced a list of suppliers divided into low, medium and high-risk categories, based on spend, industry sector and geographical location of production or service.

We looked at the Global Slavery Index to support our analysis of geographic risks and assess whether the country/area have a high prevalence of Modern Slavery or other labour rights violations. The categories of goods and services we view as higher risk 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, IT, contact services and, in general, industries that rely heavily on low skilled, migrant workers.

The list enabled us to identify 110 suppliers operating in high risk industry sectors, such as uniforms, manufacturing, catering, and/or high risk geographical locations such as Bangladesh, Turkey and India.

Next year, we will extend our Whistleblowing hotline to the top 30 high-risk suppliers to provide a safe space for them to self-declare instances of human rights abuse or breaches of the Code of Conduct. We will also consider the implementation of further due diligence, where appropriate.

In addition, we refreshed the internal guidelines to embed risk assessment and management at the point of onboarding suppliers, so that Modern Slavery due diligence can be carried out during the tender process either through the Modern Slavery questionnaire and more specific contractual clauses.

V. Effectiveness and KPIs

At easyJet, we use a number of key performance indicators to assess and measure the effectiveness of our Modern Slavery strategy, such as the number of reported suspected incidents, the number of staff trained, non-compliances found through due diligence, the

number of investigations our Security team is involved in and our control self-assessment survey ("CSA").

➤ Suspected incidents

We have not received any reports of a Modern Slavery incident in our supply chain in 2019.

Our Cabin Crew reported a suspected human trafficking incident in 2019. In that case, the local competent Authorities and the social services were notified in accordance with the human trafficking section of our Cabin Crew training module and the Authorities confirmed that no action was required.

➤ Training

As explained in more detail below, this year we rolled out a new face to face training programme specifically designed for our ground and flight operations teams to raise awareness of modern slavery and human trafficking, help to spot the signs and increase confidence in reporting suspected cases. In order to ensure consistency in the quality of training delivered, all eligible trainers responsible for the cabin, flight and ground crew and managers communities were trained in September 2019.

➤ CSA survey

Each quarter, we issue a control self-assessment (CSA) to all members of the AMB and their direct reports. In 2019 we used this process to assess recipients' awareness of our policy framework and whether they had suspected any incidents; 100% of all recipients responded and demonstrated overall a high level of knowledge of easyJet's Human Rights and Modern Slavery policy and procedural framework (including reporting routes), with 94% stating that they are familiar with easyJet's policies and all stating that they have never suspected an incident of Modern Slavery. .

➤ Investigations

Our Security team continues to collaborate with the relevant Authorities in various Countries. The team are engaged with Police Trafficking Teams across easyJet's network and support their investigations. In 2019, the Security team supported 43 investigations: 17 in Germany, 14 in Spain, 3 in France, 4 in Greece, 1 in Sweden and 4 in the UK.

VI. 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 Legal team.

➤ Cabin Crew and Ground Staff

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.

During 2019 we reviewed and updated the training materials for our Ground Staff and Cabin Crew, in accordance with the guidelines of IATA's EyesOpen campaign. This is a face to face training aimed at raising awareness of Modern Slavery, with specific focus on trafficking of persons, and providing knowledge on how to detect and manage cases of Modern Slavery on the ground and on board of the aircraft. The training contains case study examples and explains the actions to be taken if concerns arise.

The new training was rolled out to our Ground Staff in May 2019; the training sessions are delivered by our ground handling providers with our ground operations managers providing

oversight, guidance and periodic quality checks. All of our Cabin Crew members will be required to complete the new face to face Modern Slavery training in 2020.

With specific regard to our Ground Staff, in addition to the face to face training, 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 made easily available to our Ground Staff via an online portal.

➤ **M&A**

Finally, members of our Legal team attended Unicef UK's workshop on Safeguarding for Business, a training session to support businesses wanting to learn more about safeguarding. The workshop provided an overview of what safeguarding is, as well as support to carry out risk assessment and gap analysis of potential safeguarding issues and to create and roll out a safeguarding implementation plan.

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.

Maaïke de Bie

Group General Counsel & Company Secretary

Approved by the Board of easyJet plc on 6th February 2020

31 March 2020

This fourth 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 Maaïke de Bie; Maaïke is the appointed sponsor of Modern Slavery Act compliance and the easyJet Group General Counsel & Company Secretary.