

ANTI-BRIBERY AND CORRUPTION POLICY

Effective 1 March 2025

Applicable to: All Communities

easyJet

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Overview

The Policy

easyJet is committed to ensuring it fully complies with all anti-bribery and corruption legislation and therefore adopts a zero-tolerance approach in the event any breach of this Policy is suspected or detected.

easyJet always requires its employees and workers to act honestly and with integrity. This Policy explains what form bribery and corruption can take, how this can be reported and outlines what easyJet's response will be in cases where such behaviour is found to have taken place.

Purpose

This Policy sets out our approach to ensure a common understanding of bribery and corruption, how we ensure compliance and also the significant risks in this area, both to the individual and to the company, of failing to comply with this Policy.

Aims and objectives

The main aims and objectives of the Policy are to:

- > Meet legal, and regulatory, obligations with regards to anti-bribery and corruption
- > Ensure a common understanding of what is meant by bribery and corruption
- > Explain the relevance to easyJet employees of needing to comply with this Policy and the risks both to the company and the individual of failing to do so
- > Provide clear guidance on where any actual or suspected bribery/corruption activity can be reported to

Commitment

Our commitment

In order to make a complex area more understood by staff, this Policy contains clear guidance as to the question '*what is bribery and corruption?* Staff working in areas of higher risk will be provided with dedicated training.

easyJet is committed to reduce the risk of exposure to bribery and corruption, and steps taken include the following:

- > A Bribery and Corruption risk assessment is maintained identifying areas of risk and the controls and assurance in place to minimise risk
- > A mandatory training module is completed by all new starters, and existing staff complete the mandatory annual Bribery and Corruption refresher course
- > A confidential reporting route to raise any suspected breaches is provided through the 'Speak Up, Speak Out' process

easyJet has operating guidelines which address record keeping, approval procedures and appropriate behaviour. Regular bribery and corruption risk assessments are carried out to ensure that the anti-bribery and corruption programme is robust and that easyJet has procedures for identifying and mitigating bribery and corruption risk.

Your commitment

You are required to follow this Policy when undertaking your role at easyJet. It is a breach of this Policy if you:

- > pay, offer or promise a bribe to any person, in any country;
- > request or accept a bribe from any person, in any country;
- > give anything of value to a Foreign Public Official in order to gain an advantage for easyJet;
- > make a facilitation or grease payment in any country; or
- > act corruptly.

These acts are prohibited by criminal laws in the UK and most of the countries in which easyJet operates. This Policy is designed to protect you and easyJet from the serious consequences of breaching those laws.

If you breach this Policy, subject to in-country processes, you will face disciplinary action and risk losing your job at easyJet.

A breach of this Policy may also lead to criminal prosecution for both you and easyJet.

Subject to local laws, you could face an unlimited personal fine (which will not be paid by easyJet) or up to 10 years in prison. In addition, easyJet could face an unlimited fine as a result of your behaviour. It could prevent easyJet from bidding on any future public contracts and its Directors could be sent to prison as they may face Directors' liabilities.

Even where no criminal offence or fines are issued, any potential act of bribery and/ or corruption will require time-consuming and costly investigations, as well as reputational damage to easyJet.

Policy Information

What is meant by Bribery and Corruption?

A bribe is either:

- > offering, promising or giving anything of value to a third party with the intention that the third party will act improperly, to gain a business advantage for easyJet; or
- > requesting, soliciting or accepting anything of value from a third party as a reward for having acted improperly, or an inducement to act improperly.

It is irrelevant whether the bribes or inducements are given directly or via a third party, and there is no set monetary value at which a payment or gift becomes a bribe it is the intention with which it is given which is important.

Bribes can be anything of value, not just cash. So, gifts, hospitality, holidays, vouchers and so on can all be bribes. Therefore, to protect both yourself and easyJet you must always abide with the Gifts & Hospitality and seek guidance where you are uncertain.

Corruption is a generic term used to describe any dishonest conduct. This may include the giving or receiving of bribes, any fraudulent act, or acting in a way that puts your own interests in conflict with those of easyJet, whilst in the course of your employment.

A facilitation or grease payment is a payment made to an Official to speed up routine action to which you are already entitled. Regardless of local custom, these payments are illegal, no matter where in the world they are made.

A Foreign Public Official includes any person holding a legislative, administrative or judicial position of any kind or who exercises a public function on behalf of any country outside of the UK, or who works for any public enterprise or agency. This includes employees of state-owned enterprises, such as most airports in Europe, employees of local authorities or tourist boards.

Gifts, Hospitality and Entertainment

To avoid any suggestion that gifts, hospitality or entertainment may constitute a bribe, you may only give or accept gifts, hospitality or entertainment in accordance with easyJet's **Gifts and Hospitality Policy** and the company's **Expenses Policy**.

Breach Monitoring and Compliance

How to report a suspected breach

Any suspected breaches of this Policy should be reported via easyJet's independent 'Speak Up, Speak Out' helpline. This route also allows concerns to be raised confidentially. Reports can be raised on the telephone, a desktop computer or a mobile phone. Full details can be found at <https://easyjet.sharepoint.com/sites/ReportingConcerns>

Consequences of breaching this Policy

easyJet will investigate any actual or suspected breach of this Policy, or the spirit of this Policy, thoroughly and impartially. Anyone found to be in breach of this policy may be subject to a formal process relevant in-country.

Communication and Compliance

> Policy communication

We will make this Policy available on Sharepoint and it will be referenced in mandatory training.

> Policy compliance

- Maintaining a Policy that is available on Sharepoint for all employees. This will be reported to the Group Policy Forum.
- Delivering mandatory training where required and monitoring completion rates
- Recording all actual/suspected bribery/ corruption events reported through SUSO, or line management. These will be analysed to determine if process improvements are required and will be reported to the Business Integrity Committee and Audit Committee.
- Ensuring that bribery and corruption checks continue to form part of easyJet's supplier onboarding/monitoring processes.
- A compliance questionnaire will be sent to senior management to confirm compliance with this Policy and whether any exceptions have been noted.

Document details and version control

Document reference

- > Anti-Bribery and Corruption Policy

Policy owner

- > Director of Risk Assurance & Finance Transformation

AMB sponsor

- > Chief Financial Officer

For more information

Please contact:

Version	Last review date	Review details	Next review date
FIN/PO/GLO/002/V1	1/1/24	First published 1/1/24	1/1/25
FIN/PO/GLO/002/V2	1/2/25	Reviewed 1/2/25	1/2/26

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