

CODE OF BUSINESS ETHICS

Applicable to All Communities

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INTRODUCTION



Our strategy includes five key promises, including the pledges to act 'always with safety at our heart' and to 'live the orange spirit' in our interactions with each other, customers, and suppliers. Treating one another with respect and upholding ethical standards are paramount in our daily operations. Our shared dedication to a culture of honesty and integrity defines us.

The Code of Business Ethics outlines the essential ethical principles and supporting policies we must follow. Upholding these standards is not only our collective responsibility but crucial to preserving our identity and reputation. It's imperative to absorb the Code and align yourself with the expected behaviours.

If, for any reason, you feel that we are not meeting these standards, please speak with your line manager or refer to our 'Speak Up, Speak Out' policy which provides details on how to confidentially report this. Also please feel free to contact me or any other member of the AMB. It's vital that we all work together to protect the airline and its great reputation. Thank you for your support.

Kenton Jarvis
Chief Executive Officer

ELIGIBILITY

This Code of Conduct applies to everyone who works for easyJet. It also applies, as far as possible, to our suppliers and contractors. If you are a line manager, you'll also need to:

- Ensure that everyone who reports to you has read and understood the Code and has completed any required training;
- Encourage your team to ask questions about anything they're unsure of and report any concerns;
- Always follow up if you're aware of, or suspect, conduct that is not in line with the principles set out within this Code.

OUR COMMITMENT TO YOU

- Our goal is to create an environment that really helps you to give your best, ensuring that you feel valued for your contribution
- We want everyone to have an equal opportunity for success by ensuring:
 - All employees and potential employees are treated fairly and with respect;
 - All employees are free from harassment of any description, or any other form of unwanted behaviour;
 - All employees have an equal chance to contribute and to achieve their potential.
- easyJet has a programme of measures to deter non-compliance with our ethical principles. This helps to reduce our exposure to unethical practices. Ethical risks are identified and assessed through the Speak up Speak Out Policy and other forms of employee interaction, including employee surveys. All issues are investigated and corrective measures are put into place where required.

THE ETHICS TOOL

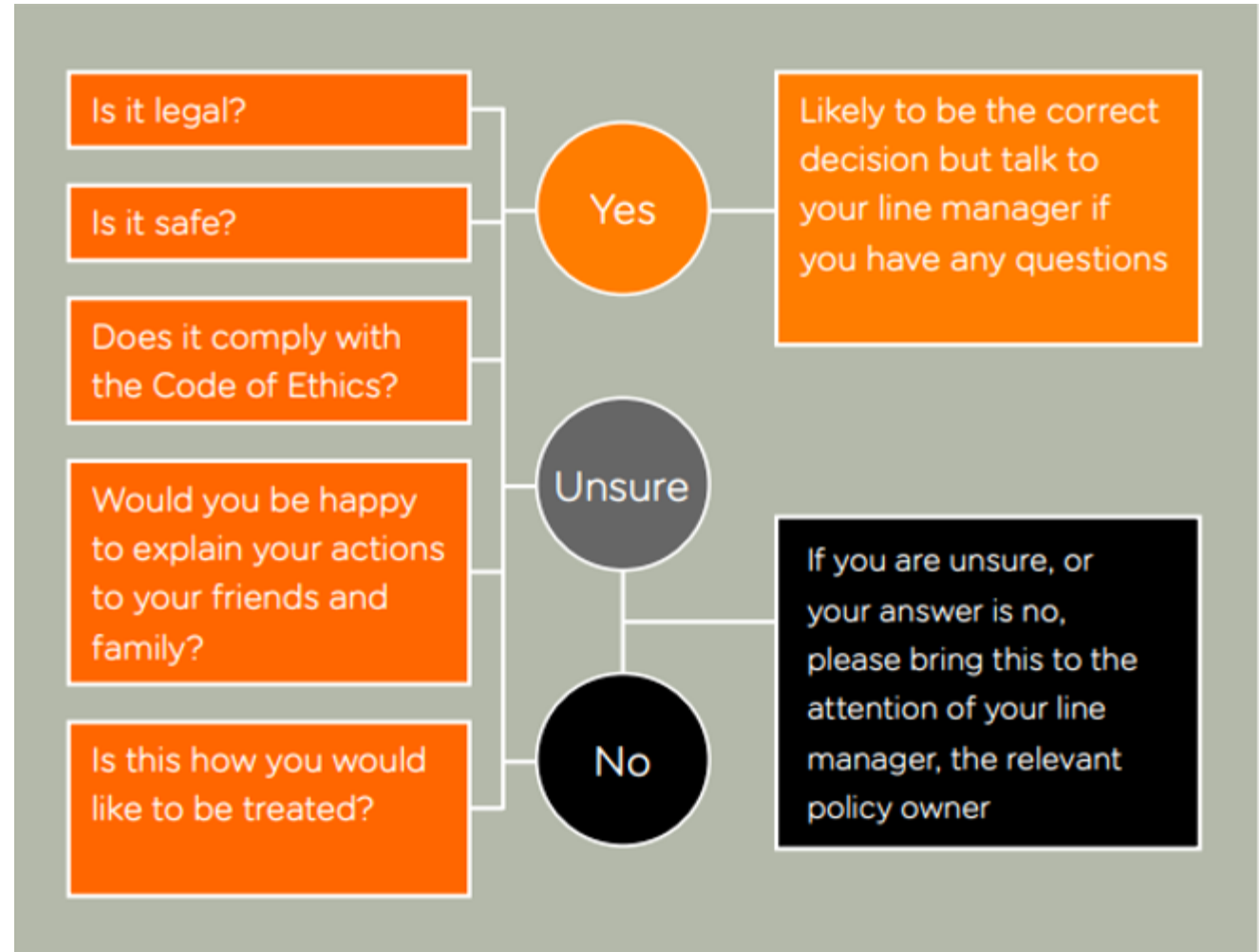
Everyone working for easyJet has a duty to uphold the principles in the Code

As the business world becomes more complex, there may be times when you're faced with difficult scenarios.

If you're unsure of how to behave, consider:

- Is your action legal?
- Is your action safe?
- Does it comply with our policies and values
- If you do it, would you feel bad? Is it how you would like to be treated?
- Could it damage easyJet's reputation if this were made public?

Our ethics principles are an important reference guide; however, they do not address every legal or ethical situation or issue that you may come across.



ETHICAL PRINCIPLES

Our five business ethical principles are listed below. In the following pages you will find relevant policies to guide you for each area.

- **Safety first.** Perform your job with the highest regard for safety, for both customers and colleagues, and report any activity that might compromise safety or violate applicable laws, regulations, or our policies. We work in an industry where safety is paramount and consequently where the highest standards of care for our assets and for our business records are demanded. Further information can be found on our Inside page, follow work > Safety.
- **Integrity.** Behave honestly and with integrity when dealing with our people, our customers, our partners and the communities within which we operate.
- **Conflicts of interests.** Never use or attempt to use your position at the company to obtain any improper person benefit for yourself, your family, or for any other person.
- **Compliance with laws.** Comply with and act within the applicable laws and regulations.

- **Speak up.** Ask questions and voice your concerns; if you learn of or suspect illegal or unethical conduct, or if you find yourself in a situation that just doesn't feel right, speak up and report your concerns to your line manager or use one of the confidential routes outlined in the 'Speak Up, Speak Out' policy.

Disclosure principles

If you spot something that you believe could bring your or the Company's conduct into question, or become aware of any existing or potential breach of laws, regulations, this Code or any easyJet policy, it is essential that you report it immediately. The best person to tell is usually your line manager or there may be instance where you should additionally escalate the concern to the People team. If you don't feel you can tell anyone in the company, you can use one of the confidential routes as outlined in the 'Speak Up, Speak out' policy.

DOING BUSINESS HONESTLY

Avoiding conflicts of interest

- Conflicts of interest can be detrimental to easyJet's business and reputation, and can even lead to criminal offences being committed.
- You must never use or attempt to use your position at the company to obtain any improper personal benefit for yourself, your family or for any other person.
- You should avoid putting yourself in a position where your interests are in conflict with those of easyJet. If you're unsure about whether a conflict of interest has arisen, or may arise, you should speak with your line manager.
- As soon as you become aware that a conflict of interest has arisen, you must declare it to your line manager.



Doing business without bribery

- easyJet has zero tolerance for bribery by employees, and follows the standards outlined in the UK Bribery Act
- You must never pay, offer or promise a bribe to any person, in any country
- You must never request, or accept, a bribe from any person, in any country.
- You must not give anything to a public official in any country in order to influence that official in his or her official capacity.
- You must not make facilitation payments to secure or expedite the performance of an existing duty by a government official. Facilitation payments are payments demanded by officials (or others) simply to secure or expedite the performance of their normal duties (for example, granting a licence, allowing goods to cross the border, and so on). These are commonplace in some jurisdictions, but the making of such payments, regardless of how small, will be an offence under the UK Bribery Act.

Interacting ethically with governments and public officials

- Particular risks arise when interacting with governments, governmental bodies and public officials.
- You must never offer a job to anyone at the request of a public official, or with the intention of influencing a public official.
- If you're liaising with a public official in order to obtain a licence, permit, or other government authorisation, or if you are negotiating tax payments / rebates, or a contract with a government department, you must ensure that discussions are appropriately supervised and minuted.

If you receive a request from a public official that you believe or suspect may be improper, you must report it as soon as possible to your line manager or through one of the routes in the 'Speak Up, Speak Out' policy.

You must read and comply with our Anti-Bribery and Corruption Policy.

Giving gifts and entertaining responsibly

Giving small gifts and reasonable corporate hospitality is part of doing business. However, in some cases gifts and hospitality may be inappropriate and may even amount to bribery.

- You mustn't offer or receive any gifts, except gifts of nominal value (less than £50), such as basic stationery, flowers, chocolates etc.
- You mustn't provide corporate hospitality to anyone unless pre-approved by a member of the Airline Management Board (AMB) (payments for meals during either business travel or for your team/department's entertainment must comply with the Expenses Policy).
- You must not accept corporate hospitality (reasonably priced meals as part of the working day are permitted) unless you've obtained your line manager's permission in advance.
- Crew must not accept tips or any unwanted products the customer has purchased onboard.

Working with third parties who share our commitment to integrity

In some instances easyJet could be criminally liable 4 acts carried out by third parties. Dealing with third parties who behave unethically may also damage our reputation.

- You must never use a third party to make a payment, or carry out an act that would be illegal or that you would be prohibited from doing under this Code.
- When you're engaging a third party, or renewing a contract with a third party, you must conduct appropriate due diligence, depending on the risk level presented by that third party.
- If you're responsible for a partnering arrangement, or a joint venture, you must take steps to ensure that our partners are reputable and will behave with integrity.
- Lookout for red flags, such as third parties whose function is opaque, an unusually complex partnering arrangement, or the use of companies in tax havens, which might indicate criminal behaviour.

All easyJet suppliers must sign up to, and comply with, our Supplier Code of Conduct

Complying with international trade sanctions

Our international operations must comply with applicable laws on economic sanctions under export controls. Economic sanctions and export controls are set and/or maintained by the United Nations, the European Union, the United Kingdom and the United States, amongst others.

- You mustn't enter into a transaction with any individual or entity, or involving any aircraft, that you know to be subject to applicable economic sanctions and export controls.

If you know or suspect that a breach of economic sanctions and export controls have taken place, or may be about to take place, you must report it as soon as possible to your line manager.

Taking steps to avoid money laundering and terrorist financing

money laundering and financing terrorism are criminal offences, and EasyJet takes a zero-tolerance approach to employees that knowingly facilitate or assist money laundering or the financing of terrorism, in connection with or through our business.

- You mustn't make or be involved in any payment, or the transfer of anything of value, which you know, or suspect is derived from criminal activity.
- You mustn't engage in any activity that may involve money laundering, e.g. false invoicing practices, or helping others conceal the illegal sources of money.
- You mustn't knowingly provide funds to a terrorist or a terrorist organisation, intending that funds will be used for terrorism or terrorism-related crimes.

If you know or suspect that a money laundering or terrorist financing offence has taken place, or may be about to take place, you must report it as soon as possible to your line manager.

Maintaining privacy and security of personal data

easyJet is committed to maintaining the privacy and security of the personal data entrusted to it by our customers and employees. Data Protection Forms part of easyJet's Digital Safety Framework which also comprises Cybersecurity. easyJet has appointed a Group Data Protection Officer who is registered with the Information Commissioner's Office and who reports into the General Counsel of easyJet.

The Group Data Protection Officer manages easyJet's Data Protection Team and they are responsible for managing easyJet's compliance with applicable data protection laws, including responding to employee and customer rights requests and any data protection complaints.

easyJet has an internal Group Data Protection Policy which sets out the principles employees must comply with when handling personal data as part of their job. Their policy outlines easyJet's commitment to processing Personal Data transparently, fairly and lawfully. This policy is also supported by a number of policies, standards and guidance relating to the management of data across the company.

easyJet has a publicly facing 'Privacy Promise' for our customers which is available on easyJet's websites, as well as one for employees on the company intranet. The 'Privacy Promise' fulfils easyJet's transparency requirements under data protection law and advises customers what personal data is being collected, how it is being used, who it is shared with, the lawful basis for processing and how long it is retained for. It also provides information for customers around how they can make a rights request or raise a data protection complaint.

Data Protection is part of easyJet's internal audit programme and the Data Protection Office also undertakes a programme of Data Protection Impact Assessments and other risk assessments and assurance activities on its processing activities. Employees undertake mandatory data protection training each year.

For further information review the **Group Data Protection Policy**.

Competing fairly

There are strict rules to prevent anti-competitive behaviour and practices that restrict trade. Breaches of this policy are treated very seriously and could lead to dismissal, fines and/or imprisonment.

- You must deal fairly and honestly with all of our customers, suppliers, business partners and competitors.
- You mustn't employ deceptive or manipulative advertising or promotional practices.
- You must never enter into any agreement, either formal or informal, with competitors to fix prices, terms of sale or commission rates.
- You mustn't discuss or share commercially sensitive information such as pricing, mark sharing or allocation, or other strategic information with competitors unless specifically approved by the Competition and Regulatory Affairs team.

For further information about what is prohibited please see our Competition Law Policy & Guidance.

Engaging ethically in the political process

It is important to comply with laws and regulations relating to lobbying.

- You must never try to influence the political process by offering incentives or advantages to individuals.
- All lobbying activities must be conducted ethically and without suggestion of bribery or conflict of interest.
- Any intention to carry out lobbying activities should be first discussed with the Communication team of the Regulatory Affairs team who can advise on what you need to be aware of.
- It isn't appropriate to engage serving public officials to carry out political advocacy on our behalf.
- easyJet does not make political donations in any country.
- You mustn't use easyJet funds to finance campaign contributions or to make loans to provide facilities or services for free or at a non-commercial discount; or to assist in publishing or disseminating election material to or for any candidate for public office, individual politician, political party or other political organisation.

If you have any questions about any aspect of political engagement, please contact the Communication team or the Regulatory Affairs team.

Making a positive contribution to society

easyJet wants to make a positive contribution to society, to support the areas where its customers and employees live, as well as in the wider world. It is vital that the contributions easyJet makes towards charitable or philanthropic projects, or social investments or sponsorships of any kind, are free from any suspicion of bribery, either direct or indirect.

- You mustn't give or authorise easyJet donations or sponsorship in order to influence any person to act improperly in the performance of their duties, or to direct a business advantage to us.

All charity donations must be approved in writing by the Charity Committee. For further information please see our Expenses Policy.

Keeping accurate financial records

It's important that you record all relevant information fully and accurately in our financial records. If you are in doubt as to how to record a payment, you should speak to the Finance Director.

Keeping accurate financial records

It's a criminal offence to fail to prevent the criminal facilitation of tax evasion by persons acting on our behalf.

easyJet takes compliance with tax laws seriously in line with easyJet's, Our Tax Strategy and is committed to conducting all its operations, commercial and administrative activities in a law-abiding and ethical manner.

easyJet will not tolerate acts of criminal facilitation of tax evasion by its staff, subcontractors, agents or anyone else acting on its behalf anywhere in the world and is committed to taking steps to prevent facilitation of tax evasion.

Anti-fraud

As an employee of the Company you mustn't at any time act in a fraudulent manner.

easyJet takes fraud very seriously. Cases of actual or suspected fraud will be fully considered for further action which may involve a full and thorough investigation. This may lead to disciplinary action up to and including dismissal, and/or the involvement of law enforcement agencies. For further information you can refer to the Anti-Fraud policy,



WE UPHOLD HUMAN RIGHTS

Tackling modern slavery and human trafficking

easyJet has a zero-tolerance approach to modern slavery across all areas of the organisation and in its supply chain. Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. As a company, we support the UK Modern Slavery Act 2015.

We have measures and training in place to help prevent and address any modern slavery issues and we expect the same commitment from our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against slavery and human trafficking.

Like every other airline, easyJet is at risk of transporting victims of human trafficking. We cooperate with the efforts of national law enforcement agencies and border agencies to combat crimes such as human trafficking. Our crew and ground staff can also help to prevent human trafficking and are trained to identify and report suspect cases.

The prevention, detection and reporting of human rights violations in any part of our business, operations or supply chains is the responsibility of everyone working for easyJet.

You must read and comply with our Human Rights and Modern Slavery Policy.

Supporting labour rights

easyJet is an ethical and socially responsible employer. We respect the human rights of our employees as established in the four principles of the International Labour Organisation (ILO) Declaration.

- Freedom of association and the effective recognition of the right to collective bargaining.
- Elimination of all forms of forced or compulsory labour.
- Effective abolition of child labour.
- Elimination of discrimination in respect of employment and occupation.

Further information is provided in our Human Rights and Modern Slavery Policy.

REPORTING BREACHES OF THE CODE

Breaches of this code

We expect all employee to comply with this Code, and with the policies and procedures that supplement it. We treat breaches of this Code seriously. If we believe that a breach may have occurred, we will investigate the matter and, in line with in-country legislation, this may result in disciplinary action.

Please remember: If you become aware of an existing or potential breach of laws, regulations, this Code or any other easyJet policies, you should report the matter immediately to your line manager or through a route outlined in the 'Speak Up, Speak Out' policy available on Inside.

For further information please refer to our Disciplinary policy.

Speaking up

If you suspect that a breach of this Code may have taken place, or may be likely to take place, you must report it.

- You should report your concern to your line manager or another senior manager.
- If you feel unable to do this, you may use one of the confidential routes listed in the 'Speak Up, Speak Out' policy.
- All staff who raise genuine concerns will be protected from retaliation or detrimental treatment (including disciplinary sanctions), even where the concerns raised are ultimately found not to be founded or do not lead to any follow-up action being taken.

For more details about what to report and what number you can call, please see our Speak Up, Speak Out policy

For concerns which arise during employment with us, please refer to your line manager in the first instance, or your local HR team.

Document details

Title: Code of Business Ethics

Author: Business Integrity Senior Manager

Document Owner: Director of Risk, Assurance and Finance Transformation

This Policy has been through a governance process including Management Board sign off and a Policy Committee to ensure it remains factual and up to date.

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