

BULLYING AND HARASSMENT

A Policy sets expectations and refers to the rules, practices, and procedures established to guide the actions and decision-making of all stakeholders: employees, managers, contractors, customers, and consultative groups.

Effective 1st February 2026

Applicable to all employees.

In addition, easyJet expects third party contractors working at our premises to read and comply with this Bullying and Harassment Policy. If you are a third-party contractor and you breach this policy, we may take any steps we consider reasonably necessary, including requiring that you stop doing any work, and leave the premises immediately.

This Policy applies to the management and operation of easyJet plc and its airline subsidiary businesses, easyJet Airline Company Limited, easyJet Europe Airline GmbH, easyJet Switzerland S.A and easyJet UK Limited.

This policy doesn't form part your terms and conditions of employment and may be changed from time to time. This policy supersedes all previous and handbook versions.

easyJet

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Overview

The Policy

easyJet is dedicated to creating a safe and supportive working environment for everyone. Our Policy emphasises that our people and their wellbeing are our top priority. We do not tolerate harassment or bullying of any employees or anyone working at our premises. It is essential that everyone working within easyJet treats colleagues, customers, and visitors with respect, both in the workplace and at work-related events, and considers others' individual differences. We expect everyone to take responsibility for their own behaviour while at work.

Purpose

This policy is designed to guide you on what constitutes appropriate behaviour in our workplace, what steps to take if you witness or experience inappropriate behaviour, and how we can all contribute to a respectful workplace.

easyJet takes any allegations of bullying and harassment very seriously. If you witness or experience bullying or harassment by a colleague, customer, or external party—whether within the workplace, at a work-related event, outside of work, or online—we encourage you to speak to your Line Manager, Base Management Team, or HR. We want everyone to feel comfortable raising concerns about inappropriate behaviour.

We understand that raising allegations and being the subject of them can be challenging. Our management teams and Employee Assistance Programme (EAP) are available to provide further support when needed. For more details, please visit the You Matter Hub page on Inside.

Aims and objectives

The main aims of the Policy are to:

- > Provide guidance on what is and what isn't appropriate behaviour in our workplace
- > Provide guidance for employees to follow in order to raise concerns about inappropriate behaviour
- > Provide information about some of the support mechanisms we have in place

Commitment

Our commitment

- > We'll always treat genuine allegations of bullying & harassment seriously
- > We'll always treat you fairly and consistently
- > We'll be clear about what we expect from you and, where we can, will support you to achieve the required standard with various training, engagement, learning interventions
- > We'll proactively take steps by asking questions and monitoring your responses through our employee feedback survey, to find out what is happening in the workplace so that we can try and identify any warning signs, so that we can respond appropriately

Breach reporting

If you believe you have observed a breach of this policy, please discuss this with your Line Manager or Base Management Team in the first instance.

In addition, we have a confidential route (the 'Speak Up, Speak Out' process) through which any known/ suspected breaches can be reported.

Your commitment

All employees are expected to achieve and maintain the desired standards of behaviour and conduct we expect at easyJet, as outlined in this policy as well as other policies, codes, guides, etc.

In situations where those standards are not met, employees are expected to co-operate with and comply with the principles set out in this policy, including attending meetings, providing information as requested and preserving confidentiality.

Where employees are unsure whether behaviour meets these definitions, they are encouraged to speak to their Line Manager, Base Management Team or HR.

Policy Information

What is bullying? ^{1,2}

Bullying is generally unwanted, offensive, intimidating, malicious or insulting behaviour or an abuse or misuse of power which undermines, humiliates, puts down or hurts another person or group of people.

Bullying can take many different forms; it can be physical, verbal, emotional, psychological, or a mix of all of them. It can involve excluding someone or giving them the silent treatment. In extreme cases bullying can be aggressive, including intimidation, making threats, or humiliating someone. Sometimes bullying is carried out in an obvious and quite public way, and sometimes it can be subtle and in private so only the bully and the person experiencing bullying are aware it's going on.

Bullying can take place in person, or via other ways such as telephone, email, text, or via social networking or messaging applications. It can be persistent behaviour or a one-off incident and can occur between two individuals or involve a group of people targeting one or more persons. Bullying can also be related to activities undertaken at work or outside of work.

What is harassment? ^{3,4}

Harassment is generally unwanted conduct that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It can include harassment linked to someone's gender, gender identity, disability, age, race or ethnicity, sexual orientation and religion or belief.

Harassment is a form of discrimination and in serious cases it may constitute a criminal offence. If the behaviour is unwanted and causes offence, even when it wasn't done on purpose or the offence was not intended, this could constitute harassment.

The unwanted behaviour doesn't need to be directed at the individual in order for them to be offended by it. If the comments create an intimidating or offensive environment for that person, that's harassment.

What is sexual harassment?

Sexual harassment occurs when someone is subjected to unwanted conduct that is of a sexual nature. It's a form of discrimination that involves unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature.

It occurs when someone is subjected to unwanted conduct that is of a sexual nature. The conduct does not need to be sexually motivated to amount to sexual harassment.

¹ France: For the purposes of this policy, the definitions of bullying and harassment set out here will be considered to include professional harassment ("harcèlement moral"), sexual harassment ("harcèlement sexuel"), sexist acts ("agissements sexistes") and discrimination as defined by French law. Please see the Internal Rules ("Règlement intérieur") applicable to easyJet in France for more information.

² Netherlands: For the purposes of this policy, the definitions of bullying and harassment set out here will be considered to include directly or indirectly distinguishing factors, including sexual harassment, aggression and violence, bullying and work pressure, in the workplace that trigger stress as defined by the Dutch Working Conditions Act.

³ See note 1 above.

⁴ See note 2 above

Reporting Harassment & Bullying

All allegations, complaints, and reports of harassment and/or bullying will be dealt with seriously, promptly and in confidence, including those that report historic incidents, or involve anonymous complaints.

If a complaint or allegation is found to have been made knowingly false or malicious, it may result in disciplinary action under the applicable in-country processes.

To facilitate a prompt and thorough review, reports should include any relevant evidence and witness information whenever possible and appropriate. A lack of evidence or witnesses does not prevent concerns being raised but may limit the extent of the investigation. If you submit a complaint anonymously or you request to remain anonymous, this may limit the extent of any investigation we can undertake and could impact the fairness of the investigation. Where possible, we would speak to you about this and how we can best investigate your complaints in light of your request.

Your Line Manager, Base Management Team and/or HR will provide, in confidence, advice and assistance to employees subjected to harassment and/or bullying and assist in the resolution of any problems, whether through informal or formal means. Where a formal approach is required, it'll be managed using the process applicable under local law.⁵

Your Line Manager, Base Management Team and/or local HR team will be able to provide further details. Retaliation, in any form, against an employee who brings a complaint of harassment and/or bullying is a serious disciplinary offence which could result in dismissal.

If you're a third party contractor at easyJet and believe you've been the subject of bullying or harassment during the course of your assignment, we'd expect you to raise this with your own employer or agency in the first instance and follow any procedure they have in place to deal with such matters.

Anyone found to be harassing or bullying a colleague or external party and / or acting in breach of this policy will be subject to the disciplinary process applicable under local law which may, in serious cases, result in dismissal without notice. If you're a third-party contractor, we may require that you stop doing any work for us and leave our premises immediately.

Examples of unacceptable behaviour

The following are examples of the types of behaviour which easyJet considers to be unacceptable within a work context, and which may amount to bullying or harassment. This list is not exhaustive, and each incident will be dealt with in accordance with the circumstances of the case:

- > Threatening or using physical violence towards colleagues or customers, or anyone you encounter within our workplace
- > Using insulting or offensive language or behaviour, or language or behaviour intended to demean or ridicule another person, including via electronic or digital means
- > Sending or displaying offensive images, whether in print or via digital means

⁵ Germany: With regard to the formal process in Germany, we refer to the regulations of the Complaints Office pursuant to Sections 38, 39 TVPV 3 as well as to the Complaints Office Anti-Discrimination following the semi-formal agreement of 2 December 2021.

- > Spreading rumours or deliberately making false allegations
- > Abuse of power, particularly when one person is responsible for the management of the other
- > Excluding or isolating someone
- > Making unwelcome sexual advances or suggestive behaviour/comments
- > Engaging in unnecessary, unwanted or objectionable physical contact
- > Setting up someone to fail by giving them unachievable tasks
- > Setting an unreasonable workload or impossible deadlines
- > Singling out someone for meaningless or trivial tasks or unpleasant jobs
- > Withholding information or deliberately "losing" information
- > Deliberately failing to pass on messages or deliberately supplying incorrect or unclear information
- > Making inappropriate comments or threats about job security

Where it's found that you've used social media either at work or outside of work (including personal networking or messaging sites/applications), to share any offensive material, or inappropriate comments or images, or do anything else which calls into question your suitability to carry out the role, about colleagues or customers or third parties, to the extent acceptable under local law, these will be dealt with in the same way as if you had said them in the workplace.

Behaviour of external parties

If you experience or witness inappropriate behaviour by customers or third-party contractors within your workplace, you should discuss this with your Line Manager or Base Management Team as soon as possible. You shouldn't feel that you simply have to accept this type of behaviour as part of the job. Your Line Manager or Base Management Team will discuss your concerns with you and will take appropriate action to resolve matters.

Resolving issues informally ⁶

If an incident happens which you think may be harassment or bullying, you may prefer initially to attempt to resolve the problem informally, if you feel able to do so, and it's acceptable under local law.⁷ In some cases it may be possible and sufficient to explain clearly to the person engaging in the unwanted conduct that the behaviour in question is not welcome, that it offends you, or makes you uncomfortable, and that you want the behaviour to stop.

If this is too difficult or embarrassing for you to tackle on your own, you could seek support from your Line Manager or Base Management Team, a friend at work or a member of your local HR team. If the incident concerns a customer or other third party, you may wish to ask a manager to intervene for you on an informal basis.

If you're in any doubt as to whether an incident or series of incidents, which have occurred constitute harassment and/or bullying, then in the first instance you should approach your line manager or a member of your local HR team on an informal and confidential basis. They'll be able to advise you around the options available for resolving your concerns.

⁶ If you're an employee based in Portugal or Italy, this section will not apply to you, please refer directly to the "making a formal complaint" section

⁷ See above

If you decide to try and resolve the problem informally, it's a good idea to keep details of any incidents of bullying or harassment, and your attempts to resolve matters. If this doesn't resolve matters, these may help us investigate should you decide to take things further under a formal process.

If you choose the informal route, you may not want us to take any action. Although we'll normally follow your wishes, if we believe that the welfare, health or safety of, either you or others, may be at risk or there are other overriding reasons, we may decide to look into things further. This may involve approaching the alleged bully or harasser and taking any appropriate action.

Making a formal complaint

Where your concerns aren't resolved through the informal process or the informal process is not appropriate (for example, in cases of serious harassment and/or bullying), you may raise a formal complaint and the process applicable in your country can be provided by your local HR team.⁸

Your complaint should set out as many details as possible of the alleged conduct in question, including the name of anyone involved, the nature of the harassment or bullying, details of when and where it occurred, and the names of any relevant witnesses. It would also be useful to know if you have taken any action to attempt to stop it occurring, before raising the formal complaint.

In all cases, where a complaint has been raised, an investigation^{9,10} will take place to determine what has happened. Additionally, consideration will be given to what action may be appropriate to protect you (and anyone else involved) pending the outcome of the investigation into your complaint, bearing in mind the needs of our business and the rights of any other persons involved in the case. Where the case involves persons other than colleagues such as customers or contractors, we will try to discuss the matter with the third party where appropriate. We want to be transparent about the outcome of your complaint and may share the details of what action has been taken in response to it with you unless there are exceptional circumstances which warrant us not doing so.

easyJet takes these matters very seriously. If you make an allegation in good faith and, following an investigation, the complaint is not upheld, you'll not be the subject of any disciplinary or other action.

However, malicious complaints of harassment and/or bullying can have a serious and detrimental effect upon a colleague and the workplace generally. Where we have reason to suspect that an unwarranted allegation of harassment and/or bullying has been made in bad faith, this will be investigated in accordance with local law and may be considered an act of Gross Misconduct. We are sure that all employees appreciate that this is necessary to protect the integrity of this policy.

⁸ With regard to the formal process in Germany, we refer to the regulations of the Complaints Office pursuant to Sections 38, 39 TVPV 3 as well as to the Complaints Office Anti-Discrimination following the semi-formal agreement of 2 December 2021.

⁹ In the UK, this investigation will take the form of a grievance investigation process

¹⁰ In the Netherlands, where a formal complaint is raised related to this policy, an external investigator as part of an investigation committee will be appointed

Although we would always prefer that you raise any concerns that you have about bullying and harassment with us through the routes suggested in this policy, you can also use the Speak Up, Speak Out Policy to raise any concerns that you have¹¹.

Help & Support

We understand that raising allegations and being the subject of bullying and/or harassment is difficult. Our Employee Assistance Programme (EAP)¹² can provide further support where you need it.

Visit the [You Matter Hub](#) on the intranet for more information.

Phone:

Austria	0800 292 580
France	0800 912 665
Germany	0800 18 00 950
Italy	800 780 303
Netherlands	0800 234 3536
Portugal	800 819 670
Spain	9007 13320
Switzerland	0800 859 754 (Deutchsh) 0800 859 752 (Français) 0800 859 751 (Italiano) 0800 859 753 (English)
UK	0800 028 0199

UK

Phone: 0800 028 0199

Web Address: <https://wisdom.healthassured.org/login>

Use code: MHA202694 to register

The [You Matter Hub](#) contains a link to the Android and Apple apps.

EU

Phone: 0800 XXX XXX (use the appropriate in-country number)

Web Address: www.icaslifestyle.com

Username: easyJet

Password: eap

The [You Matter Hub](#) contains a link to the Android and Apple apps.

¹¹ For Spain – sexual harassment claims are to be reported to HR, while all other harassment claims are managed by HSE.

¹² A confidential counsellor is available in the Netherlands and is contactable via the EAP number listed above

Document details and version control

Document reference

PEO/PO/GLO/003/V6.0

Policy owner

Director of People Services

AMB sponsor

Group People Director

For more information

Please contact: ER team – erTEAM@easyjet.com

Version	Last review date	Review details	Next review date
1	08/03/2021	New policy	08/03/2022
2	01/07/2021	Approved in Italy	08/03/2022
3	17/12/2021	General review	17/12/2023
4	28/01/2022	Agreed network wide (Global policy)	28/01/2023
5	04/09/2024	General maintenance Additional information on Sexual harassment inserted to align to legislative changes in the UK Appendix added on sexual harassment applicable to UK only until engagement with network WoCo's takes place.	26/10/2025
6	23/01/2026	Your commitment – Added expectation ee understands what B&H before reporting Reporting Harassment & Bullying – Where allegations are founded to be made in bad faith, relevant in-country	01/10/2026

		<p>disciplinary action may be taken. Where appropriate and possible evidence & witness info should be included in reporting.</p> <p>Examples of unacceptable behaviour – Added rumours or deliberately making false allegations</p>	
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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 [Reporting Concerns - Home](#)

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.

We will share with individuals who are subject to action under this policy.

> Policy compliance

We will monitor compliance through the use of training, coaching, mentoring, ongoing support and post-closure case reviews.

The ER and Change team will support with a variety of disciplinary cases and act on lessons learnt and recommendations.

Appendix 1.

Further information on sexual harassment – (UK only)

We are committed to providing a working environment which is free of any type of bullying, harassment, discrimination, or sexual harassment. We want to ensure that everyone at easyJet is treated with respect and dignity and feels comfortable.

What is Sexual Harassment?

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single act can amount to sexual harassment. The conduct does not need to be sexually motivated to amount to sexual harassment. Sexual harassment may include, for example:

- > Sexual comments or jokes
- > Displaying sexually graphic pictures, posters or photos
- > Suggestive looks, staring or leering
- > Propositions and sexual advances
- > Making promises in return for sexual favours
- > Sexual gestures
- > Intrusive questions about a person's private or sex life or a person discussing their own sex life
- > Sexual posts or contact on social media
- > Spreading sexual rumours about a colleague
- > Sending sexually explicit emails or text messages
- > Unwelcome physical conduct including, touching, hugging, massaging or kissing
- > detrimental acts against an individual following their acceptance or rejection of sexual advances

A person may be sexually harassed even if they weren't the intended target. For example, a person may be sexually harassed by pornographic images on a colleague's computer in the workplace.

How do we prevent Sexual harassment at easyJet?

Everyone has a duty to uphold our promise behaviours and promote safety at easyJet. Sexual harassment is unlawful and we take a zero-tolerance approach to all forms of bullying, harassment and/or discrimination. Sexual harassment may result in a formal process taking place, (appropriate to the country you work in), which could result in dismissal.

Our policies and OLA modules underpin our behaviours and what's expected of everyone, including external parties such as suppliers and customers.

How do I report sexual harassment?

There are a number of ways to report sexual harassment at easyJet. Depending on the circumstances, you may feel comfortable to resolve the issue(s) informally by talking to the individual concerned as people are not always aware of the impact their behaviours can have on another person. You should clearly explain that their behaviour is not welcome or is making you feel uncomfortable.

Alternatively, if you don't feel comfortable speaking directly with the individual, you can raise your concerns to your line manager or base management team or an appropriate colleague to deal with and support you with the matter either informally or formally.

If informal steps are not appropriate, or have been unsuccessful, you can raise it formally through the relevant process in-country. Usually, you would share this with your line manager/base management team but where this isn't appropriate you can reach out to your local HR/ER team. Any next steps will be discussed with you and support will be offered.

Speak Up, Speak Out (SUSO)

If you feel you cannot raise a concern with your line manager or base management team, or an existing process such as SafetyNet, you can report your concern using one of the routes available in the ['Speak Up, Speak Out' policy](#), including reporting by telephone or internet and App-based reporting. You can do this openly, or completely anonymously.

How we will deal with sexual harassment complaints

Any complaints raised will be taken seriously and dealt with in a timely, confidential, and sensitive manner. As a result of any investigations that take place, warnings up to and including dismissal may be issued, depending on the evidence available and the findings of the investigations carried out at the time.

Where appropriate and possible, if a complaint is upheld, we will advise the complainant that appropriate action has been taken to address their complaint, and of any measures put in place to prevent a similar event occurring again.

Any information shared will be limited to what is appropriate and lawful, and will respect the confidentiality and data protection rights of all individuals involved.

Anyone who makes a complaint, reports witnessing wrongdoing, or participate in good faith with any investigation undertaken, should not be retaliated against or victimised as a result. Anyone found to have retaliated or victimised against an individual in this manner, will be subject to the appropriate in-country, formal process.

Where sexual harassment is believed to have taken place by a third party such as a supplier, agency worker or customer, you should follow the same process set out above, if possible. Where the matter may be too serious to raise informally, you should speak to your line manager/base management team who will raise this through the appropriate channels to ensure any relevant investigations and processes are followed.