



OUR PEOPLE POLICIES

BULLYING AND
HARASSMENT

easyJet

POLGLO009 - Bullying and Harassment Policy

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Introduction

easyJet is committed to providing a safe and supportive working environment for all our people. Our Plan sets out that our People and their Wellbeing are our priority, as such we don't tolerate the harassment or bullying of any employees or anyone working at our premises. Everyone working within easyJet is expected to be respectful towards colleagues, customers, and visitors within your workplace, or at a work-related event, and considerate of others' individual differences. You are responsible for your own behaviour while at work.

This policy has been designed to provide guidance on what is and isn't appropriate behaviour in our workplace, what you should do if you witness or experience inappropriate behaviour, and the role that everyone has to play in ensuring we create a respectful workplace.

easyJet takes any allegations of bullying and harassment very seriously. You're encouraged to tell your Line Manager, Base Management Team and/or HR if you witness, or experience, bullying or harassment by a colleague, customer or external party either within your workplace, at a work-related event, outside of work, or online. We encourage everyone to speak up if they have concerns about inappropriate behaviour.

We understand that raising allegations and being the subject of them is difficult. Our management teams and Employee Assistance Programme (EAP) can provide further support where you need it. Please visit the [You Matter Hub](#) page on Inside for further details.

Eligibility

This policy applies to all employees of easyJet across the easyJet network. This policy doesn't form part of your terms and conditions of employment and may be changed from time to time.

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.

Our commitment to you

- > We'll always treat 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

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

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.

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 also includes sexual harassment and will include actions which subject someone to a detriment because they have objected or submitted to conduct of a sexual nature.

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.

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 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

³ See note 1 above.

⁴ See note 2 above.

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.

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, customer or anyone else 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
- > Spreading rumours
- > 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
- > 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 informally⁶

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 law⁷. 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

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

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.

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 investigation⁹¹⁰ 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.

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 have.

Help & Support

We understand that raising allegations and being the subject of bullying and/or harassment is difficult. Our Employee Assistance Programme (EAP)¹¹ can provide further support where you need it.

Phone:

Austria	0800 292 580
France	0800 912 665
Germany	0800 18 00 950

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

¹¹ A confidential counsellor is available in the Netherlands and is contactable via the EAP number listed above

Italy	800 780 303
Netherlands ¹²	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 882 4787

UK

Phone: 0800 028 0199
Web Address: www.healthassuredeap.co.uk
Username: wellbeing
Password: RoamKiteBlue

EU

Phone: 0800 XXX XXX (use the appropriate in-country number)
Web Address: www.icaslifestyle.com
Username: easyJet
Password: eap

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¹² See point 8 above