



# OUR PEOPLE POLICIES

## Anti-bribery & Corruption Policy

This policy has been reviewed and approved by our UK trade unions only

**easyJet**

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## INTRODUCTION

easyJet always requires its employees and workers to act honestly and with integrity. This document sets out the policy on the control of actual and suspected bribery and corruption within or involving easyJet.



## SCOPE

This policy applies to all employees and individuals or organisations that perform services on behalf of 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 to which easyJet flies. This policy is designed to protect you and easyJet from the serious consequences of breaching those laws.



## 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, in order to gain a business advantage for easyJet; or
- > requesting, soliciting or accepting anything of value from a third party as a reward for or 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 in order to protect both

yourself and easyJet you must abide at all times 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 in order 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.

## CONSEQUENCES OF BREACHING THIS POLICY

If you breach this policy 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<sup>1</sup>. 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.

## GIFTS, HOSPITALITY AND ENTERTAINMENT

In order 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.

## REPORTING BREACHES OF THIS POLICY

If you are asked for or offered a bribe by any person you must report it to your line manager. If you are concerned that any other easyJet employee is in breach of this policy you should also report it to your line manager. If you would prefer to make a confidential report you can telephone the free confidential hotline on 0800 374 199. You can find more details in easyJet's Speak up Speak out Policy

## Document details

**Title:** Anti-bribery & Corruption Policy

**Author:** ER & Change Team

**Document Owner:** Senior Integrity & Risk Manager

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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