



ANTI-FRAUD POLICY

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

easyJet

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INTRODUCTION

This policy explains what constitutes fraud and outlines what you should do if you suspect fraudulent activity is taking place. It also makes clear what easyJet's response will be in cases where such behaviour is found to have taken place.

easyJet has a zero tolerance approach towards any incidents of fraud.

All suspected incidents of fraud will be investigated and where there is a case to answer, may result in disciplinary action up to, and including, dismissal, referral to law enforcement agencies and recovery of losses.



SCOPE

This policy applies to everyone who works for easyJet, and 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 Anti-Fraud Policy, that new starters have completed the Anti-Fraud mandatory training module, and existing staff complete the mandatory annual Anti-Fraud refresher course
- > Encourage your team to ask questions about anything they're unsure of in relation to fraud and report any concerns

If you have any questions, you can contact in confidence the Business Integrity Senior Manager, or email **Business.Integrity@easyJet.com**.

OUR COMMITMENT TO YOU

easyJet is committed to protecting funds and assets with which it has been entrusted and expects all stakeholders to similarly uphold high ethical standards.

To ensure resources are used for their intended purpose, it is essential that losses due to fraud, corruption or theft are minimised. These losses can result in both increased costs being passed on to our customers, and also affect our profits which could impact company's performance and bonuses being awarded.

DEFINITIONS AND EXAMPLES

The term 'fraud' is commonly used to describe a wide range of actions including theft, corruption, bribery, forgery, misrepresentation, collusion, money laundering, false accounting or records and concealment of material facts.

It often involves the use of deception to make a personal gain for oneself, a connected person or a third party, or a loss for another.

Although the precise legal definition of fraud differs by country, it usually always involves intent and deception and falls in to four main categories:

- > Theft – including the removal or misuse of company assets (e.g. funds or cash for personal benefit or family/friends, or stealing computers, phones, staff or passenger data)
- > Bribery and Corruption – either offering or attempting to receive a bribe, or failing to prevent this (further information is available in the Anti-Bribery and Corruption policy)
- > False accounting and/or making fraudulent statements – dishonestly destroying, defacing, concealing or falsifying any account, record or document with the intent to cause loss to the company or furnishing information which is, or may be, misleading and/or making fraudulent statements with a view to personal gain for gain for another (e.g. false expense claims; submitting false overtime claims)
- > Abuse of position – abusing a position in which one is expected to safeguard, or not act against, the financial interests of the company

If you have any queries about what constitutes fraud, please contact the Business Integrity Senior Manager or email **Business.Integrity@easyJet.com** in confidence for advice.

EXAMPLES

Internal fraud includes, but is not limited to, staff or contractors committing or attempting to commit:

- > A dishonourable or reckless or deliberate act against the interests of easyJet for financial gain, e.g. purposefully (with knowledge) attempting to 'get around' or abuse a policy such as staff travel or holiday entitlement
- > Forgery or alteration of any document or accounting record belonging to easyJet
- > Misappropriation of funds, securities, supplies or other assets
- > Submitting false claims for payments or reimbursement
- > Accepting or offering a bribe or accepting gifts or other favours under circumstances that might lead to the inference that the favour was intended to influence decision-making whilst working at easyJet. Further information is outlined in the Gifts and Hospitality Policy and the Anti-Bribery and Corruption Policy
- > Profiteering as a result of insider knowledge of company activities
- > Disclosing confidential and proprietary information to outside parties

External fraud relates to external organisations' actions including, but not limited to:

- > Being offered a bribe or inducement by a supplier
- > Receiving fraudulent (rather than erroneous) invoices from a supplier

PROCESS

In order that both internal or external investigations are not prejudiced, line management must not undertake preliminary enquiries until any suspicion has been reported to, and advice taken from, the Business Integrity Senior Manager.

If you suspect attempted/actual fraud/theft, or irregular activity:

- > Concerns should be reported through one of the confidential routes offered in the 'Speak Up, Speak Out' policy, except in the case of in-flight fraud where this should be reported in all cases to Inflight Loss Prevention by emailing inflight.fraud@easyJet.com.
- > You can find more details in easyJet's 'Speak up, Speak Out' policy which can be found at: <http://inside/teams/reportingconcerns/Pages/default.aspx>

- > There may also be instances where you should additionally escalate the concern to your Line Manager/ the People team so that they're aware and can take any necessary local actions. The best contact for the People team for this type of issue is: **ERteam@easyJet.com**.

In all cases, where a concern has been raised, an investigation 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 concern, 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 concern 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 raise a concern in good faith and, following an investigation, the concern 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 fraudulent activity has been made in bad faith, this will be investigated in accordance the Disciplinary Policy 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

FRAUD RESPONSE PLAN

Once reported, easyJet has established arrangements in place to investigate any concerns raised. Investigations will be completed in line with in-country legislative requirements.

Document details

Title: Anti-Fraud Policy

Author: Business Integrity Senior Manager

Document Owner: Head of Risk & Assurance

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.

Last Review: April 2022



OUR PEOPLE POLICIES