

HUMAN RIGHTS & MODERN SLAVERY

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



OUR PEOPLE POLICIES

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INTRODUCTION

easyJet has a responsibility to the global community to conduct business in an ethical and transparent way. We take that responsibility very seriously and want to do the right thing for our customers, our people, our partners, our suppliers and the communities in which we operate.

We are committed to acting ethically and with integrity in all our dealings and relationships and to implementing effective systems and controls to seek to ensure that human rights violations are not taking place in our business or in our supply chains. easyJet is further committed to continuous improvement regarding recognised industry standards regarding human rights and modern slavery violations.

easyJet has in place a number of policies to support recognised human-rights principles. These include associated policies which can be found on our People policy page. easyJet's policies and working practices seek to respect and maintain the human rights standards defined in the International Bill of Human Rights. easyJet observes the principles set out by the International Labour Organisation Declaration on Fundamental Principles and Rights at Work (the 'ILO Declaration').





WHAT IS MODERN SLAVERY?

easyJet does not tolerate the use of forced, compulsory, bonded or child labour. As a company, we support the transparency objectives and principles of the UK Modern Slavery Act 2015 ('MSA'). Modern slavery is a crime and a violation of fundamental human rights. It 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. easyJet takes a zero-tolerance approach to modern slavery, is committed to implementing measures and training to help prevent and address any modern slavery in our business and throughout our supply chains. We expect the same commitment to the MSA from our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions and requirements in respect of slavery and human trafficking.

SCOPE

easyJet is obliged by law to publish a statement addressing the issue of modern slavery and human trafficking, detailing steps taken to limit the risk of it occurring within our organisation or our supply chains. Our statements can be found here.

These principles apply to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers and

seconded workers ("easyJet Personnel"). Each person that these principles apply to must be alert to the signs of modern slavery (see Appendix 1) and know how to report and respond to these concerns.



OUR EMPLOYEES

easyJet conducts its employment practices in an ethical and socially responsible manner. It respects the human rights of its employees, as established in the four principles of the ILO Declaration:

- > Freedom of association and the effective recognition of the right to collective bargaining: easyJet recognises and respects its employees' right to join associations and choose representative organisations for the purpose of engaging in collective bargaining, in a manner consistent with applicable laws, rules and regulations.
- > Elimination of all forms of forced or compulsory labour: easyJet does not utilise forced or compulsory labour. It recruits its employees (and provides working conditions, including payment of wages and benefits) in accordance with applicable laws and regulations.

- > Effective abolition of child labour: all easyJet employees meet or are above the legal employment age in the country of their employment.
- Elimination of discrimination in respect of employment and occupation: easyJet has an employment policy of non-discrimination.
- easyJet's People Team: Provide written contracts of employment that comply with applicable legal requirements and carries out the relevant checks to confirm employees are legally able to work in the relevant jurisdiction. easyJet does not require staff to pay any direct or indirect fees to obtain work and checks the full names and addresses of easyJet Personnel (a number of people listed at the same address may indicate high shared occupancy, often a factor for those being exploited).

easyJet only uses agreed specified reputable recruitment agencies, which are under regular review.



SUPPLIERS AND THIRD PARTIES

easyJet seeks to identify and prevent adverse human rights impacts directly linked to its business relationships, through obtaining appropriate contractual commitments and undertaking appropriate due diligence on suppliers (including enhanced due diligence on high risk suppliers). These checks have regard to the level of risk, the laws that easyJet must comply with and the International Labour Organisation's indicators of forced labour.

easyJet has a Supplier Code of Conduct which it requires all suppliers to comply with (and to ensure that their sub-contractors comply with) a number of social and environmental principles. A copy of the Supplier Code of Conduct can be found **here**.

COMMUNITIES

easyJet supports a number of community initiatives and activities across its network. It also focusses its charitable efforts through a successful partnership with UNICEF.

HUMAN TRAFFICKING

Like every other airline, easyJet is at risk of transporting victims of human trafficking. easyJet seeks to comply with all relevant laws in the countries in which it operates, and cooperates with the efforts of national law enforcement agencies and border agencies to combat crimes such as human trafficking.

easyJet fully cooperates and supports police with human trafficking investigations relating to its passengers. Our crew and pilots can also help to prevent human trafficking and receive training to raise awareness of human trafficking and to understand the reporting process.

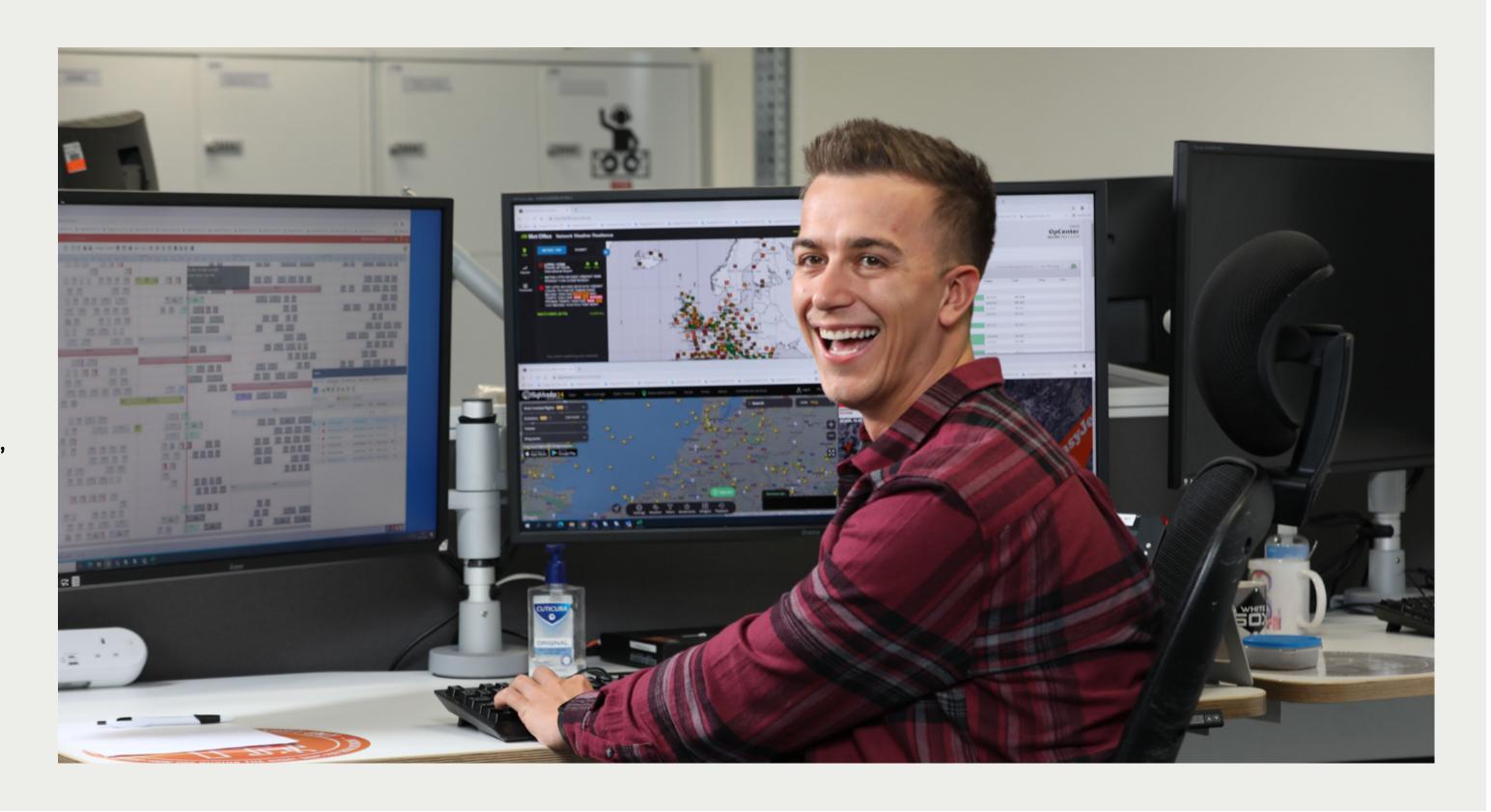


COMPLIANCE WITH THESE PRINCIPLES

All easyJet Personnel are required to abide by these principles and to endeavour to ensure that the suppliers and third parties they work with on easyJet's behalf observe these principles.

The prevention, detection and reporting of human rights violations in any part of our business, operations or supply chains is the responsibility of all those working for us or under our control. easyJet requires that all easyJet Personnel avoid any activity that might lead to, or suggest, a breach of these principles.

Our commitment to addressing issues of human rights and modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of any business relationship and reinforced as appropriate thereafter





REPORTING INCIDENTS

If you believe or suspect a breach of these principles has occurred or is likely to occur in easyJet's business or supply chain, including having a suspicion of modern slavery taking place, you need to report this at the earliest opportunity using these routes:

- > through one of the confidential routes offered in the easyJet 'Speak Up Speak Out' policy. Further information, and the policy, can be found here.
- > there may also be instances where you should additionally escalate your concern to your Line Manager / the People team so that they're aware and can take any necessary local actions. The contact for the People team for this type of issue is: erteam@easyJet.com.

We encourage openness and will support anyone who raises genuine concerns in good faith under these principles, even if they turn out to be mistaken. If you are unsure about whether a particular act within our business or any tier of our supply chain may constitute any of the various forms of human rights violations, raise it through the Speak Up Speak Out hotline, or contact the Business Integrity Senior Manager in confidence at: Business.Integrity@easyJet.com.

If you believe modern slavery might be taking place you need to report it, but you must be careful and act with caution as the wrong course of action may put you or a potential victim at risk. Do not confront the issue head on, instead report the issue as set out above.

If you believe that someone is in immediate danger you should call the emergency services in addition to using one of the confidential routes outlined in the 'Speak Up Speak Out' policy as soon as reasonably practicable. It is important that you do not put yourself at risk and you should only call the emergency services where it is safe to do so. If you believe calling the emergency services may put the potential victim at risk you must still raise a concern through one of the routes in the 'Speak Up, Speak Out' policy.

Some individuals are more susceptible than others but you should not let pre-conceptions of what a typical victim looks like cloud your judgment. Annex 1 to these principles sets out high-level guidance on modern slavery and some of the signs to look out for. If in doubt, you must speak-up.



BREACHES OF THESE PRINCIPLES

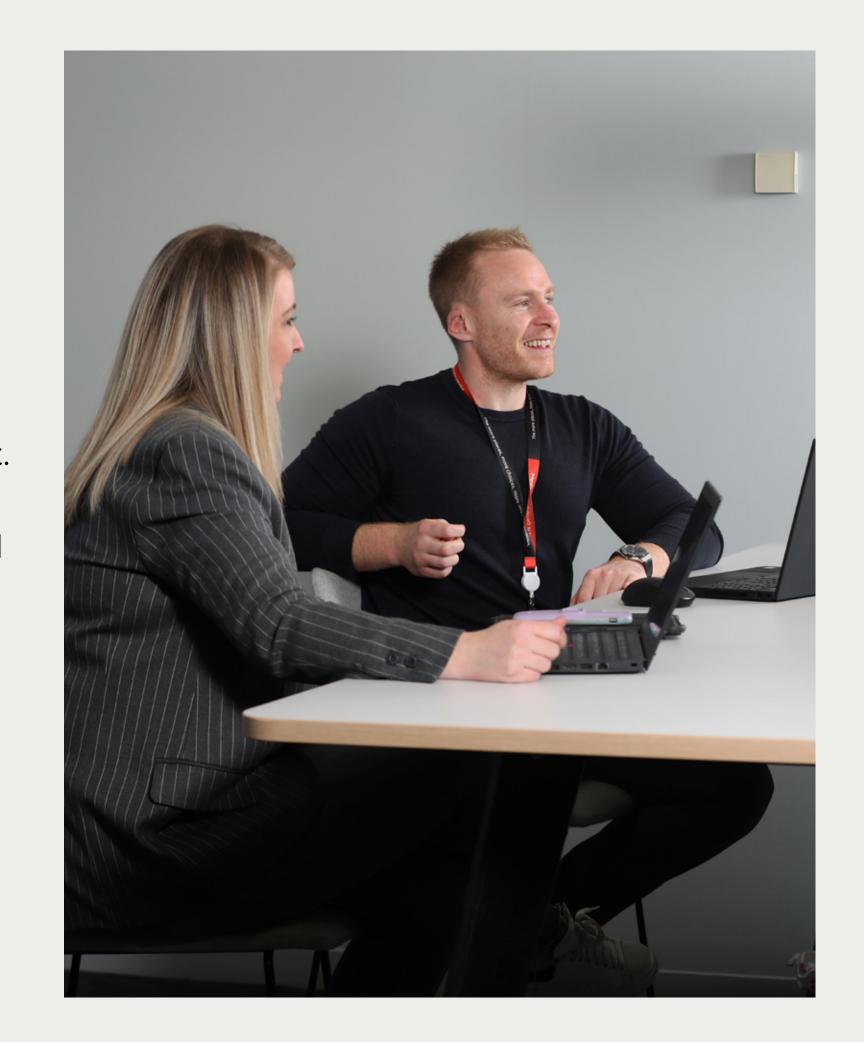
Subject to local employment laws and procedures, any employee who breaches these principles may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Other suppliers or business partners who do not meet the standards we expect will be asked to take action to address this. We may terminate our relationship with individuals and/ or organisations working on our behalf if they breach these principles.

RESPONSIBILITY OF THESE PRINCIPLES

The Senior Business Integrity Manager has primary responsibility to ensure these principles reflect easyJet's latest approach; easyJet Personnel may raise any queries regarding these principles by emailing Business.Integrity@easyJet. com. Management at all levels are responsible for ensuring those reporting to them understand and comply with these principles.

These principles may be updated from time to time; the most recent version will be available on the intranet.





OUR PEOPLE POLICIES

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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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