

## easyJet Modern Slavery Act Transparency Statement

31 March 2022

### Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and sets out the steps taken by easyJet during the financial year ending 30 September 2021 to ensure that Modern Slavery is not taking place in any part of its business and supply chain.

This statement is produced in a period in which the global COVID-19 pandemic continues to affect easyJet and the wider aviation industry. Despite this, the company has continued to build on the work it has done around modern slavery as set out in previous statements. Details of the actions taken by easyJet during this period of continued uncertainty are included in this report.

"Modern Slavery" is used as an umbrella term to account for all conducts which constitute an offence under the Act. It comprises slavery, servitude, forced or compulsory labour and human trafficking.

This is our sixth statement made under the Act. Our previous statements can be found via the following link <http://corporate.easyjet.com/corporate-responsibility/modern-slavery-actstatement>.

In accordance with section 54 of the Act, in this statement we talk about:

- I. Our organisational structure
- II. Our policies in relation to Modern Slavery
- III. Our due diligence processes in relation to Modern Slavery
- IV. The way we assess and manage Modern Slavery risks in our organisation and supply chain
- V. Our effectiveness in ensuring that Modern Slavery is not taking place in our business or supply chain
- VI. The training about Modern Slavery available to our staff

### I. About easyJet – Organisational structure and supply chain

#### (i) The easyJet business

The impact of the global COVID-19 pandemic has created a level of uncertainty in the airline industry which has been significant and far reaching. Therefore, easyJet has had to adapt structurally. Overall passenger numbers and flights operated have significantly reduced year on year, due to ongoing Government travel restrictions.

During the financial year ending 30 September 2021, easyJet carried more than 20 million passengers and flies over 308 aircraft on 927 routes to 153 airports across 34 countries.

As at 31 December 2021, we employed almost 14,000 employees across the group and around 2.5% of those employees are on fixed term and seasonal contracts.

We employ people on contracts in nine countries across Europe, governed by the national laws of those countries. We do this so that our roles are attractive in those countries and to reflect each country's employment practices. Our main office is in the United Kingdom.

We recognise 24 trade unions, 1 European Works Council, 5 local Works Councils and 3 other employee representative bodies. These representative bodies cover the entire employee workforce with the exception of our most senior management teams. Our pilot, cabin crew and engineering workforces account for roughly 89% of the overall workforce and we recognise trade unions for all these populations.

easyJet has three operating airlines: one in Austria, one in the UK and one in Switzerland.

Alongside easyJet, easyJet holidays continued to establish itself as a leading tour operator. Despite a second year disrupted by the pandemic, it is now Europe's fastest growing holiday company taking customers on holidays across the easyJet network. easyJet holidays has continued developing long term strategic relationships with hotels (63% of bookings are with directly contracted hotels), destination management companies and trade/tourism boards and its approach to Modern Slavery and expectations on its suppliers is communicated as part of those relationships where appropriate. This statement incorporates further information about this business.

Further details of easyJet's subsidiaries and corporate structure can be found in our Annual Report.

## **(ii) The easyJet supply chain**

easyJet and easyJet holidays has a varied supply chain. During 2021 we had suppliers operating in the following industries / sectors which are categorised according to our Procurement systems. We also record the country where each supplier is established.

- **Our internal category of industry/sector:**

Air Leasing; Airport Services; Engineering; Financial Services; Fuel; General Counsel; HR Services; Information Technology; Marketing; Operations; Partner & Inflight; PR & Communications; Property and Facilities; Sales Distribution Channels; Travel & Events

- **Countries our suppliers are established**

The majority of easyJet suppliers are established in the UK, EU & EEA member states. There are a small number of suppliers established in the following countries, including: USA, Turkey; Albania; Egypt; Estonia; Israel; Jordan; Morocco; Serbia; Hong Kong; Cayman Islands; Brazil; United Arab Emirates; India; Mauritius and in addition, some suppliers have operations supporting easyJet in some additional countries, including Poland, Bulgaria, Romania and Slovakia.

## **II. Our policies in relation to Modern Slavery**

The Airline Management Board ("AMB") set a tone at the top that demonstrates easyJet's commitment to integrity, ethical behaviour and doing the right thing.

In particular, the AMB set up a clear plan to take the company forward, consisting of five promises which express what we stand for, what we value and how we behave. The first promise is to be "safe and responsible" by making ethical decisions and acting in a safe and responsible way.

- **The Modern Slavery Working Group and the Audit Committee**

Building on this promise, the Modern Slavery Working Group is responsible for the development and implementation of our Modern Slavery strategy. The Working Group was established in 2016 and is composed of senior management representatives from relevant functions across the business, including the Legal team, the People Team, Procurement, Sustainability, Cabin Crew Operations, Crew Training, Ground Operations, Security and easyJet holidays. The representatives worked throughout the year and met formally on four occasions. Outside meetings, representatives continued regular discussions during the year to continue to monitor and assess the effectiveness of the steps we are taking and issue recommendations on the areas for improvement in addressing Modern Slavery.

In addition, the Audit Committee of the easyJet Board continued to oversee the whistleblowing process and reports identifying cross-company trends raised through the whistleblowing process, as well as other routes, and ensure appropriate action has been taken by management.

- **Our policies**

As reported in our previous statements, we have in place policies to support recognised human rights principles. These include a specific policy on Human Rights and Modern Slavery, as well as policies on

non-discrimination, health and safety, anti-bribery and whistleblowing. During the year, we have commenced a refresh of the Human Rights & Modern Slavery policy and other company policies, ensuring that all policies are up to date and relevant. Once approved the new policies will be widely communicated in the business during the next financial year. Further details of easyJet policies can be found in our previous transparency statements.

All our ethical policies are available on our intranet site and all are referenced in mandatory training, which is easily accessible by all personnel.

Our Supplier Code of Conduct requires all suppliers to comply with (and to ensure that their sub-contractors comply with) a number of social and environmental principles including ensuring fair treatment of employees and a respectful working environment, no breach of human rights including no forced labour, and no bribery or corruption. Our suppliers are required to respect internationally recognised human rights, including those expressed in the United Nations International Bill of Human Rights, and the internationally recognised rights and principles set out in the International Labour Organisation's Core Conventions and Declaration on Fundamental Principles and Rights at Work. By agreeing to comply with the Code, our suppliers also commit to conduct their business consistently with the United Nations Guiding Principles on Business and Human Rights, to not employ or use any form of child, forced, bonded or compulsory labour and to strictly prohibit any form of slavery or human trafficking in their operations and supply chain. Our suppliers are also required to have at all times a written policy in relation to such matters and to ensure the policy's effective implementation within their organisation.

During the year, we updated our Supplier Code of Conduct. Changes were made to reflect the actions we expect suppliers to take to reduce their impact on climate change and other environmental issues. Updates were also made in the context of the risks which easyJet holidays could face from suppliers of travel/hotel services relating to slavery, exploitation, child abuse and trafficking.

easyJet holidays policies and procedures and ethical standards are aligned with easyJet wherever appropriate. This has ensured a consistent approach to implementation and updates to policies/procedures and enables clear communication of those processes internally and externally to suppliers.

We aim to keep our internal processes under review and this year we looked at the procedures our cabin crew follow when handling human trafficking reports. We implemented a change to our Cabin Safety Procedures Manual in this regard. In 2022, our Procurement team are also aiming to re-launch the company wide Procurement Policy that will contain risk trigger questions (including in relation to modern slavery).

- **Adapting policies and procedures due to Covid-19**

We outlined in our statement last year, the measures we undertook and guidance we followed to support our employees and suppliers during the pandemic. We have continued to adapt to the changing situation and adjust our policies, processes, and guidance as appropriate. Our Biosecurity Standards Group (BSSG), chaired by our Head of Safety, has met weekly throughout the year and involves stakeholders from across easyJet. The BSSG reviews the latest data and performance of our biosecurity controls to ensure that our biosecurity measures continue to meet easyJet's Safe & Responsible promise as well as country specific requirements in the countries we operate to.

We have shared our approach to managing the biosecurity risks through use of our biosecurity standards with aviation and health regulators across the easyJet network. The feedback received on this approach and these standards has enabled the easyJet biosecurity standards to be accepted in compliance with the myriad of local and national regulations throughout the pandemic.

Please refer to the 2020 Statement for further details.

- **Stakeholder engagement**

To understand the effects of Covid-19 on human trafficking and modern slavery and to be aware of any different risks we may face in relation to air travel, our Aviation Security team approached the Police Human Trafficking unit. During a productive meeting, our Security Advisor shared details of our training, policies and annual statement.

Our Director of Sustainability presented to the Modern Slavery working group about the Global Sustainability Tourism Council (GSTC) (of which our Director continues to be a board member and attends regular meetings). The Director talked about modern slavery featuring in the criteria and standards set for sustainable travel and tourism. More about the role of GSTC is in section IV (Our risk assessment and management).

In preparation for the launch of our new Modern Slavery eLearning module (more about this in section VI Modern Slavery Training), a presentation was given to the Management & Administration ("M&A") Consultative Group to raise awareness and highlight the importance of this topic to our workforce.

### **III. Our due diligence processes**

During the financial year easyJet worked with approximately 1376 direct suppliers (plus hotel accommodation suppliers as explained in the section below) and has a large indirect supply chain. We require all supplier and partner organisations we work with to operate to the highest standards, both internally and in managing their own supply chains, and to share our values and respect for human rights.

- **Supplier Code of Conduct**

As mentioned above, easyJet has a Supplier Code of Conduct that has been incorporated into contracts with suppliers, including new suppliers of accommodation, transport and ground handling services to easyJet holidays.

- **Contract clauses**

Where appropriate and depending on the perceived risk of a supplier (based on a risk based approach) assessed by review of the external market, our supplier agreements include contractual clauses requiring compliance by the supplier, its subcontractors and its suppliers, with internationally recognised standards relating to human rights, as well as compliance with the Act and all other applicable antislavery and human trafficking laws and regulations.

For suppliers categorised as a higher risk, these contractual clauses allow easyJet to review steps they have taken to ensure that slavery and human trafficking is not taking place in any of their supply chains or in any part of their business. The clauses also enable easyJet to audit the supplier and its subcontractors' premises, take copies of the supplier and its subcontractors' records and interview the supplier and its subcontractors' personnel. The supplier is required to notify easyJet immediately upon becoming aware of any actual or potential breach of these clauses. In case of breach, easyJet would take action as appropriate, which may include working with the supplier to resolve the issue and could result in termination, should the breach be considered to be irremediable.

- **Compliance Questionnaire and Procurement Guidance**

During the year we produced and launched a guidance pack for our Procurement team. The purpose of the pack was to help the team identify when key risks apply and outline the process that must be followed to explore and mitigate these risks.

Central to this process is our Compliance Questionnaire, which was reviewed and updated during 2021 and forms part of our e-sourcing system. It comprises of multiple questions designed to allow the suppliers to comment accurately on the potential modern slavery and other compliance risks in their business and supply chain and the steps they are taking to detect and address those risks, as well as to identify what further action the supplier may need to take in the future. The guidance pack is a resource for the Procurement team to refer to when assessing and acting on any red-flag

responses to questionnaires. Any specific risk identified through the supplier's responses to the questionnaire is addressed directly with the supplier either contractually and/or through further due diligence, as appropriate. As an example, the questionnaire was recently included in the Digital Safety Programme tenders and was completed by several suppliers. All responses were reviewed and no further action was required.

#### IV. Our Risk assessment and management

This year through our risk assessment and management we have responded to the impacts of Covid-19. Improvements in our Procurement systems have also been carried out, as explained below.

- **Our organisation**

During the year we organised a workshop with the aim of reviewing the actions that would need to be taken in the event a report of a modern slavery incident in our business or supply chain was raised. We re-visited how incidents might be identified and how they should get reported in the business taking localised risks into account. We agreed on using our whistleblowing process to capture details of any incidents or concerns and using our Business Integrity team to coordinate and follow up actions based upon an investigation plan.

- **Our supply chain**

We have continued to make improvements in centralising the data we have available on all our suppliers. The new supplier directory is being used which enables easyJet to produce reports and monitor the MSA risk ratings across our suppliers more effectively.

We continue to assess our suppliers and give each supplier a risk rating based on industry sector and geographical location of production or service.

We use the Global Slavery Index to support our analysis of geographic risks and assess whether the country/area have a high prevalence of Modern Slavery or other labour rights violations. The categories of goods and services we view as higher risk include suppliers of uniforms, aircraft headrest covers and carpets, wiring looms used in the manufacture of aircraft, inflight food and beverages, hotel capacity providers, cleaners of aircraft, hotels and hire cars, taxi / shuttle transportation companies, IT, contact services and, in general, industries that rely heavily on low skilled, migrant workers.

In addition to hotel accommodation suppliers (see section below), the number of suppliers operating in high risk industry sectors, such as uniforms, manufacturing, catering, and/or high-risk geographical locations such as Bangladesh, Turkey and India are currently 77.

During the year, we transitioned our whistleblowing hotline to a new provider, with increased capabilities (including reporting in local languages and a tracking system for following a report). We also communicated our whistleblowing hotline to over 20 high-risk suppliers, inviting them to use our service if they didn't operate their own service. The aim being to provide a safe space for them to self-declare instances of human rights abuse or breaches of the Code of Conduct. Two suppliers agreed to make our hotline available to their employees and number of other suppliers advised us of their existing whistleblowing hotline arrangements.

We will also consider the implementation of further due diligence, where appropriate.

- **Accommodation Suppliers**

The hotels offered by easyJet holidays remains an important area of focus and is a core part of the company's sustainability strategy announced this year. The strategy recognises the important role of the Global Sustainable Tourism Council (GSTC), which manages the GSTC Criteria, global standards for sustainable travel and tourism; as well as providing formal recognition for sustainable tourism Certification Bodies which audit to GSTC criteria. During 2021, easyJet holidays became a member of GSTC. In becoming a member of GSTC, easyJet holidays has committed to support hotels it works with to achieve certification by a GSTC accredited certification body or certification to a GSTC

recognised standard. One such body is Travelife - a leading training, management and certification initiative for tourism companies committed to reaching sustainability. Human rights and modern slavery form part of the audits carried out by Travelife and by other certification bodies recognised by GSTC.

All direct contracts with easyJet holidays accommodation suppliers encourage hotels to obtain (unless already held) and maintain Travelife Gold certification or certification to another GSTC recognised certification body.

During the year, we also communicated to all our directly contracted hotel providers through our 'Hotel Manual' with our expectations around modern slavery, emphasising that we expect nobody working in the hotel or hotels' supply chain to be exploited or have to work against their will, that hotel premises are not used for exploitation or trafficking and that any instances of exploitation or trafficking are immediately reported to us.

## **V. Effectiveness and KPIs**

At easyJet, we use a number of key performance indicators to assess and measure the effectiveness of our Modern Slavery strategy, such as the number of reported suspected incidents, the number of staff trained, non-compliances found through due diligence, the number of investigations our Security team is involved in. It is recognised that the impacts of COVID-19 could contribute to modern slavery and human trafficking occurring and we remain vigilant in this regard. Even with reduced flying, suspected incidents and investigations have been handled by our teams as reflected in the below update.

- **Supplier Directory**

As indicated in the previous section, improvements in centralising the data we hold on suppliers was delivered in early 2021 and further work to improve the profiles we hold on suppliers is ongoing.

- **Suspected incidents**

We have not received any reports of a Modern Slavery incident in our supply chain in 2021. Our Cabin Crew reported two suspected human trafficking incidents in 2021. These incidents were assessed by the crew and pilots according to the company procedures in place at that time and no further action was taken.

- **Training**

As explained in more detail below, we have continued to deliver a training programme specifically designed for our ground and flight operations teams to raise awareness of modern slavery and human trafficking, help to spot the signs and increase confidence in reporting suspected cases. We have also launched a new eLearning module for our M&A employees.

- **Investigations**

Our Security and Data Protection team continues to collaborate with the relevant Authorities in various Countries and our Security team are engaged with Police Trafficking Teams across easyJet's network. In 2021, the Data Protection team supported 11 requests for information in connection with human trafficking, all from UK authorities.

## **VI. Modern Slavery training**

Building on the programme we established in 2016, we continue to deliver targeted training designed to meet the level of knowledge required by their role to management staff that are in a position to identify Modern Slavery risks in the supply chain and operations. All our staff are encouraged to discuss any concerns they may have in relation to Modern Slavery with their line manager and ultimately the Legal team.

- Cabin Crew and Ground Crew

With specific regard to human trafficking, for all airlines and other transport providers, there is a risk that their services may be used by human traffickers. We recognise that our Cabin Crew and Ground Crew can be in a position to identify and report suspected cases.

During 2021 we continued to train our Cabin Crew, (including over 350 new entrant Cabin Crew), in accordance with the guidelines of IATA's EyesOpen campaign. The training has continued to raise awareness of Modern Slavery, with specific focus on trafficking of persons, and providing knowledge on how to detect and manage cases of Modern Slavery on the ground and on board of the aircraft. The training contains case study examples and explains the actions to be taken if concerns arise.

Training for Ground Crew involved updates being made to existing training material and that material being available through our Connect Portal to Ground Handlers. Ground Handler trainers deliver the training to new Ground Crew and it is available for all providers to ensure staff are adequately trained.

- M&A

In 2021 we developed a new eLearning module to provide information, guidance and clarify reporting channels for modern slavery within the M&A employee community. The module was successfully launched to a selected audience and completed by almost 200 employees. We intend to widen the audience to include our entire M&A community in 2022.

We will continue to assess the risk of Modern Slavery in easyJet's business and how we address this. Based on internal and external feedback, we will continue to monitor our progress and find ways to further improve our processes and operational procedures to mitigate the risks.



Johan Lundgren

Chief Executive Officer

Approved by the Board of easyJet plc on 21 March 2022

### 31 March 2022

This sixth statement has been made by the easyJet group, that is easyJet plc (company number 03959649) and its airline and holiday subsidiary businesses, easyJet Airline Company Limited, easyJet Europe Airline GmbH, easyJet Switzerland S.A, easyJet UK Limited and easyJet holidays Limited. 'easyJet' means this group of companies. It has been approved by the Boards of Directors of easyJet plc and easyJet Airline Company Limited and signed by easyJet plc Director and Chief Executive Officer Johan Lundgren.