

easyJet Modern Slavery Act Transparency Statement

31 March 2021

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 2020 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. In addition to our normal, continued activity to prevent modern slavery, we have also responded to the additional effects of COVID-19 and, where relevant to modern slavery, these actions 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 fifth 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 an unprecedented 11- week grounding of flights during the spring/summer and also ongoing Government travel restrictions.

During the financial year ending 30 September 2020, easyJet carried more than 55 million passengers and flies over 342 aircraft on almost 1000 routes to 154 airports across 35 countries.

As at 31 December 2020, we employed almost 14,000 employees across the group. Most are employed on permanent employment contracts, with around 280 employed on fixed term contracts and around 450 employed on seasonal contracts. (The number employed on seasonal contracts has increased year on year. This was as a consequence of the COVID-19 pandemic and followed a collective redundancy consultation undertaken by easyJet with its trade unions representing UK pilots and cabin crew. As part of the ways to mitigate the number of potential redundancies a number of alternative options were offered, including seasonal employment.

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 group headquarters are in the United Kingdom.

We recognise 23 trade unions, 1 European Works Council, 5 local Works Councils and 4 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 of these populations.

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

In November 2019, **easyJet holidays** (formerly a business operated independently from easyJet), was re-launched as a business operated by easyJet plc, with its first customers travelling from 6 January 2020. easyJet holidays is developing long term strategic relationships with hotels, destination management companies and trade/tourism boards and its approach to Modern Slavery is reflected in these relationships. 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 2020, an assessment was made of all direct suppliers. We have suppliers operating in the following industries / sectors which are categorised according to our Procurement systems. We also record the country 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 is a small number of suppliers established in the following countries; USA, Russia; Turkey; Albania; Egypt; Estonia; Israel; Jordan; Morocco; Serbia; Hong Kong; Cayman Islands; Brazil; Singapore; United Arab Emirates; India; Mauritius.

With planned improvements in our supplier directory as outlined in this statement, we aim to record further information about the countries in which each supplier operates in.

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 Commercial. The representatives worked throughout the year and met formally on two occasions. Outside of 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 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. Further details of easyJet policies can be found in our previous transparency statements.

All our ethical policies are available in a dedicated and centralised intranet page called “Compass (Ethics and compliance policies)”, 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.

As part of the launch of easyJet holidays, we took the opportunity to ensure that the policies and procedures and ethical standards of easyJet holidays were aligned with easyJet wherever appropriate. This ensured a consistent approach was followed and policies/procedures could be effectively incorporated into new business processes and allowed for clear communication of those processes internally and externally to suppliers.

As regards our Whistleblowing policy, a trial was successfully completed that enabled concerns, including those related to Modern Slavery, to be reported directly through the Internet or a mobile App (in addition to through the whistleblowing hotline). The online based services were rolled out to our people in other countries during 2020.

➤ Adapting policies and procedures due to Covid-19

In response to the emergence of COVID-19 we introduced a range of measures to protect our people, employees in our supply chains and our customers. Safety has been of utmost importance. We have followed the guidance set out by the WHO, the International Civil Aviation Organisation (ICAO) which is also recognised by civil aviation authorities and national governments, as well as the European Aviation Safety Agency, the European Centre for Disease Control and Prevention and Public Health England. We have set up a bio security standards group which regularly reviews standards and recommended practices from these organisations and we have published biosecurity information to our customers on our [website](#).

In line with guidance across Europe, we tell all customers that they must not travel if they have COVID-19 symptoms. Similarly, easyJet employees must not come to work if they have symptoms and we have sick pay policies applicable in all countries for all easyJet employees.

Masks must be worn by customers, ground crew and cabin crew during boarding and onboard. We're recommending physical distancing (at least 1.5 meters between individuals), enhanced hygiene measures for staff and passengers and enhanced facility cleaning. We're encouraging customers to use automated bag drop where available and recommending transparent screens at counters. Where possible, we are asking everyone to limit contact and touching of surfaces and passenger property should be minimised. This includes travel documents and boarding passes. In the event our staff are sick, we have sick pay policies applicable in all countries for all easyJet employees.

We took appropriate steps to support our suppliers when it came to payment of orders to help to avoid supplier workers being unpaid for work completed. We considered payments and prioritised these on a case by case basis and reduced terms for very small companies in order to protect their cashflow. We maintained regular weekly payment runs and minimised any interruptions that may have been caused by having to furlough some of our employees.

➤ Stakeholders engagement

This year our Aviation Security team attended a workshop run by Essex Police that included a presentation from the charity A21 [www.a21.org] who gave an overview of Modern Slavery and Human Trafficking. The workshop provided guidance from law enforcement and border force officers on identifying and dealing with the issue. Information from the workshop was shared on the company intranet.

Our Director of Sustainability is also a board member of the Global Sustainability Tourism Council (GSTC) and attends regular meetings and conferences. More about the role of GSTC is in section IV (Our risk assessment and management).

III. Our due diligence processes

easyJet engaged with more than 1600 direct suppliers during the financial year and also 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. The Code of Conduct is currently under review with an updated version due to be published in 2021.

➤ Contract clauses

In addition, all of our supplier contracts include a clause 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.

We also continue to include more detailed Modern Slavery Act compliance clauses in supplier contracts, where appropriate, using a risk-based approach which specifically takes into account the geographical area and industry in which the supplier operates (as detailed in the risk assessment section below).

These clauses oblige the supplier to submit an annual slavery and human trafficking report setting out the 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.

➤ Modern Slavery questionnaire

Further, suppliers deemed to pose a higher risk from a Modern Slavery perspective are required to complete a due diligence Modern Slavery Questionnaire.

The questionnaire consists of twenty-two questions designed to allow the suppliers to comment accurately on the potential modern slavery 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. Any specific risk identified though 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 Berlin Airport Ground Handling tender 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. We have also ensured easyJet holidays policies and procedures in this area are aligned to existing group wide approach. Improvements in our Procurement systems have also been carried out, as explained below.

➤ Our organisation

During a Safeguarding Workshop in 2019, it was recognised that there was a need to further develop, and communicate, a framework across the company in which suspected Modern Slavery activity can be identified and reported in a consistent manner. The identification and reporting of incidents was assessed and it was confirmed that these can be raised through line management, our SafetyNet system (available to all employees and airport ground handling agent representatives), or through the anonymous whistleblowing hotline. The Human Rights & Modern Slavery Policy will be updated to reflect this, and the reporting framework will be further communicated to our M&A employees through a new Modern Slavery eLearning due to be rolled out in Spring 2021.

➤ Our supply chain

This year, we have implemented a new supplier form and process for the business to follow when requesting proposals from suppliers. When a new supplier form is submitted, a Modern Slavery risk rating is allocated to the supplier based on their category of spend and country. This new process provides improved due diligence ensuring that a Modern Slavery questionnaire and specific contractual clauses are included in agreements as applicable.

In addition, we have focused on improving and centralising the data we have available on all our suppliers. This information will form the basis of a new supplier directory that will be launched in 2021. The directory will enable easyJet produce reports and monitor the MSA risk ratings across our suppliers more effectively.

This follows the review in 2019 of our entire supply chain to continue to improve our understanding of where Modern Slavery risks lie and check that nothing materially changed from the previous risk assessments. We continue to assess our suppliers and divide those into low, medium and high-risk categories, based on spend, 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.

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 is currently 279.

During 2020, we were preparing to communicate our Whistleblowing hotline to the top 30 high-risk suppliers to provide a safe space for them to self-declare instances of human rights abuse or breaches of the Code of Conduct. During this process we identified an opportunity to increase the language options on the hotline that could be offered by moving to a new provider of this service, which has meant the revised hotline services will now be communicated during early 2021.

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

Accommodation Suppliers

Following the launch of easyJet holidays, a new and important area of focus is the hotels we offer. The Global Sustainable Tourism Council (GSTC) 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. 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](#)

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 with as reflected in the below update.

➤ Supplier Directory

As indicated in the previous section, our focus on improving and centralising the data we hold on suppliers is due to be completed in early 2021 and that will provide enhanced visibility and reporting measures to develop our Modern Slavery strategy in future.

➤ Suspected incidents

We have not received any reports of a Modern Slavery incident in our supply chain in 2020. Our Cabin Crew reported two suspected human trafficking incidents in 2020. In each case, the local competent Authorities were notified in accordance with the human trafficking section of our Cabin Crew training module. No further requests for information concerning these cases was received from the Authorities.

➤ 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.

➤ Investigations

Our Security team continues to collaborate with the relevant Authorities in various Countries. The team are engaged with Police Trafficking Teams across easyJet's network and support their investigations. In 2020, the Security team supported 36 investigations: 8 in Germany, 22 in Spain, 1 in France, 1 in Ireland, 1 in Netherlands and 3 in the UK.

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 and we train them accordingly.

During 2020 we continued to train our Ground Crew and Cabin Crew, in accordance with the guidelines of IATA's EyesOpen campaign. Training during the first part of the year was face to face but this was quickly adapted to be delivered online to comply with Covid-19 restrictions. 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. The new training was also delivered to our Ground Crew from October 2019 to March 2020; the training sessions were delivered by our own easyJet trainers who delivered the same training to our Cabin Crew.

Moving forward, guidance and training material will be made available to ground handling providers through our 'Connected' online portal and all providers are contractually required to ensure staff are adequately trained. Some ground handling providers will also have their own Modern Slavery training which they will deliver to their teams.

➤ M&A

In 2021 a new online eLearning module is due to be launched to provide information, guidance and clarify reporting channels for modern slavery within the M&A employee community.

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.

A handwritten signature in black ink, appearing to read 'Johan Lundgren', is positioned above the printed name and title.

Johan Lundgren

Chief Executive Officer

Approved by the Board of easyJet plc on 11 February 2021

31 March 2021

This fifth statement has been made by the easyJet group, that is easyJet plc 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.