

easyJet

Modern Slavery Act Transparency Statement

31 March 2023

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 2022 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 and specifically the Omicron variant, continued 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 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 seventh statement made under the Act. Our previous statements can be found via the following [link](#).

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

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I. About easyJet – Organisational structure and supply chain

(i) The easyJet business

During the financial year ending 30 September 2022, easyJet carried almost 70 million passengers and flew over 320 aircraft on 988 routes to 153 airports across 34 countries.

As at 31 December 2022, we employed almost 15,000 employees across the group and around 3% 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 23 trade unions, 7 local Works Councils, 2 union informal bodies and 2 other consultation and information bodies (including European Work Councils). 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 87% 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 continues to be Europe's fastest growing holiday company taking over 1.1 million customers on holidays across the easyJet network. easyJet holidays has continued developing long term strategic relationships with hotels (a significant number 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 p. 181 of our [Annual Report](#).

(ii) The easyJet supply chain

easyJet and easyJet holidays have a varied supply chain. We categorise our suppliers based on the industry / sector and the country in which they are established. Categorisation was as follows:

- **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 and their supporting operations 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; and Mauritius.

II. Our policies in relation to Modern Slavery

Governance

The Board sets the tone at the top that demonstrates easyJet's commitment to integrity, ethical behaviour and doing the right thing.

In particular, the Airline Management Board ("AMB") set up a clear plan to take the company forward, consisting of our strategy for 'Making Low-Cost Travel Easy', made possible by our people **"always with safety at our heart"**.

Building on this promise, easyJet's approach to modern slavery includes the following:

- **Effective Management Oversight: The Modern Slavery Working Group and the Audit Committee**

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 Business Integrity 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. Summaries of the reports and actions taken by this Committee are presented to the Audit Committee of the easyJet Board.

- **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, updates were completed to our [Human Rights & Modern Slavery policy](#) ("MS Policy") and other company policies. The revised MS Policy was launched to our UK, Swiss, Portugal and Netherlands businesses in February 2022 and details of the MS Policy were included in our eLearning module.

in 2022 we also updated our [Supplier Code of Conduct](#).¹ The Code requires 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

¹ Changes were made in relation to our use of suppliers subject to international sanctions.

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.

easyJet publishes its policies and Supplier Code of Conduct on its internal intranet site and includes details of its policies in its mandatory training programme. In addition to this, during 2022, easyJet has published its ethical policies and Supplier Code of Conduct externally on the [company's corporate website](#).

easyJet holidays policies framework and ethical standards are broadly aligned with easyJet and wherever appropriate there is consistent implementation. This enables a clear communication of those processes internally and externally to suppliers.

We aim to keep our internal processes under review and this year we updated the reporting process that our Crew follow when raising incidents to our control centre and security team.

In February 2022, our Procurement team re-launched the company wide Procurement Policy that contains risk trigger questions (including in relation to modern slavery). This was also followed by a new mandatory eLearning module on Procurement that was launched in September 2022 to the Management & Administration ("M&A") teams across easyJet.

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

The measures we undertook and guidance we followed to support our employees and suppliers during the pandemic continued during the year. 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 always put safety at our heart as well as country specific requirements in the countries we operate.

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.

- **Stakeholder engagement**

A representative from the Modern Slavery & Organised Immigration National Crime Unit was invited to attend easyJet's Modern Slavery Working Group meeting. The Officer delivered a presentation to the Group, highlighting the methods traffickers use to transport victims by air, and providing guidance to easyJet to help 'spot the signs' of trafficking taking place. The outputs from this presentation were also useful for the refresh of our Crew training. (More details in the [Training section VI](#) below).

During 2021-22, our Director of Sustainability continued to be a board member and attended regular meetings of the Global Sustainable Tourism Council (GSTC). From December 2022, the easyJet holidays Customer & Operations Director succeeded the Director of Sustainability as a member of the GSTC Board. 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 easyJet European Human Resources team to raise awareness and highlight the importance of this topic to our workforce.

Selected members of easyJet's Modern Slavery Working Group met with the Chaplain of Luton Airport to discuss human trafficking issues and share details of the training provided to easyJet people.

easyJet has had a partnership with UNICEF for the past 10 years supporting a variety of projects, in total raising over £16m throughout the partnership to support their work. Over the past year, this has included onboard collections for UNICEF's Ukraine Appeal, with donations exceeding £800,000. UNICEF has been helping children and families fleeing the war in Ukraine who are at heightened risk of human trafficking and exploitation.

III. Our due diligence processes

During the financial year easyJet worked with approximately 1700 direct suppliers (plus hotel accommodation suppliers as explained in the section below) and has a large indirect supply chain. easyJet expects 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 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), our supplier agreements include contractual clauses. These require 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**

A guidance pack for our Procurement team is available to refer to. The pack is designed to help the team conduct a risk assessment and 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 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.

- **Supplier Visits**

The Contact Management Centre Risk Team carried out visits to a number of sites in high-risk countries. During those visits, workers were questioned at random about their employment conditions and no evidence to suggest modern slavery was occurring was apparent. The company is planning to introduce a more formal audit for Contract Centre service providers during the coming year.

IV. Our Risk assessment and management

- **Our organisation**

The company has put in place a process to follow in the event a report of a modern slavery incident in our business or supply chain was raised. This process was developed by understanding how incidents might be identified and how they should get reported in the business taking localised risks into account. easyJet's whistleblowing process would be used 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 on the MSA risk ratings recorded against different suppliers on the directory.

We continue to give each new 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 around 165. This number is based on the information we have recorded on our supplier directory at the time of commencing

contracting with the supplier and usually only takes into account the country in which the supplier is established and industry sector.

In 2022, easyJet holidays approached one its suppliers based outside the EU, to trial the use of easyJet's whistleblowing hotline, promoting this to its employees. 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. Use of the hotline by this and other third-party suppliers is subject to review and current contractual status. 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 in September 2021. 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. easyJet holidays is a member of GSTC and 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.

In 2022, easyJet holidays made some changes to its website to promote hotels that have achieved this recognised certification. The company has a [dedicated webpage](#) featuring hotels which are certified.

It has also included a prominent label on the holiday search pages, showing those hotels which are 'Eco certified'.

During the year, easyJet holidays also communicated to all its directly contracted hotel providers through its 'Hotel Manual' and with an additional notice containing our Supplier Code of Conduct. These communications set the company's expectations around modern slavery, emphasising that easyJet holidays 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 be 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, and the number of investigations our Security team is involved in.

- **Supplier Directory**

Work is ongoing to improve the profiles we hold on suppliers in our central contract database, and to ensure that copies of supplier contracts not currently on the database are moved across to the database.

- **Suspected incidents**

We have not received any reports of a Modern Slavery incident in our supply chain in 2022. Our Cabin Crew reported five suspected human trafficking incidents in 2022. 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 Management & Administration (“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 2022, the Data Protection team supported 6 requests for information in connection with human trafficking, from UK and European authorities. The number of requests is lower than previous years, however, authorities are not obliged to disclose the nature of their enquiries so there may have been additional trafficking related investigations made during this period that were not known by easyJet.

VI. Modern Slavery training and awareness

In April 2022, to coincide with the publication our last Modern Slavery Annual Statement, we featured an article about this in our ‘Weekly News’ for easyJet employees, which was delivered to around 14,000 people.

During the year, we’ve introduced new training programmes across the easyJet teams as explained below. All our staff are encouraged to discuss any concerns they may have in relation to Modern Slavery with their line manager, the Legal team or through our confidential Speak Up Speak Out (whistleblowing) service.

- **Crew Training**

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 2022, we re-designed our Crew training modules. We consulted with a representative of the Modern Slavery & Organised Immigration National Crime Unit to help shape our training and incorporate the IATA Eyes Open campaign.

The training has been delivered to 7900 new and existing Cabin crew, and 480 new and returning Flight Crew. This will be rolled out to our 4000 existing Flight Crew over the course of 2023 and 2024. 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.

During 2022 training material for Ground Crew was updated and made 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.

- Management & Administration (“M&A”)

Following the launch in 2021 of a new eLearning module that was delivered to a selected audience, this was rolled out to the entire M&A community in September 2022. At the end of the calendar year, more than 2200 employees had completed this mandatory training.

Next steps

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 16 March 2023

31 March 2023

This seventh 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