

**easyJet Modern Slavery Act Transparency Statement**  
**31 March 2024**  
**Introduction**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act"). It outlines the steps taken to combat modern slavery during the financial year ending 30 September 2023 ("FY23") by the easyJet Group, comprising easyJet Airline Company Ltd (referred as "easyJet"), easyJet Holidays Ltd (referred as "easyJet Holidays") and other group companies.<sup>1</sup>

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

This is our eighth statement made under the Act and all previous statements can be found via [this link](#).

We continue to build on the work previously undertaken to identify the risks of Modern Slavery and put in place preventative measures, as set out in previous statements.

In accordance with section 54 of the Act, this statement sets out:

- I. Our organisational structure and supply chain
- II. Our policies in relation to Modern Slavery
- III. Our due diligence processes in relation to Modern Slavery
- IV. Our risk assessment and management
- V. Effectiveness and our key performance indicators ("KPIs")
- VI. Employee training and awareness on Modern Slavery

**I. Organisational structure and supply chain**

**(i) The easyJet Group business**

During FY23, easyJet carried 82.8 million passengers and flew 336 aircraft on 1,018 routes to 155 airports across 35 countries. We also employed almost 17,000 employees across the easyJet Group (with around 4.5% of those employees on fixed term and seasonal contracts).

We have three operating airlines, in the UK, Austria and in Switzerland. Our main office is in the UK, but we also have employees across nine European countries, on contracts governed by those national laws. This attracts the best talent in those countries and ensures that our contracts reflect each of those country's employment practices.

We recognise 23 trade unions, 8 local Works Councils, 1 union informal body and 2 other consultation and information bodies (including European Work Councils). These bodies represent the majority of our workforce, with the exception of our senior management teams. Our pilots, cabin crew and engineering teams account for c. 87% of our employees and we recognise each of their trade unions.

Our easyJet Holidays business continues to be Europe's fastest growing holiday company, taking c. 1.9 million customers on holiday across the easyJet network. easyJet Holidays has continued developing long term strategic relationships with hotels (with a significant number of directly contracted hotels), destination management companies and trade/tourism boards. easyJet Holidays clearly communicates with those suppliers its approach and expectations in relation to Modern Slavery.

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<sup>1</sup> Further details of our subsidiaries and corporate structure can be found on p.193 of our Annual Report and Accounts 2023.

## **(ii) The supply chain of the easyJet Group**

We have a varied supply chain and categorise our suppliers internally based on the industry/sector and the country in which they are established:

- Overall industries/sectors:

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

From these overall sectors, the following are considered high risk for Modern Slavery: Airport Services; Engineering; Information Technology; Operations; Partner & Inflight; Property and Facilities; and Travel & Events.

(Please refer to *Section IV (iii)* and *(iv)* for our high-risk sub-sectors within those overall industries and our approach to Accommodation Suppliers).

- Countries where our suppliers are established:

The majority of our suppliers and their supporting operations are established in the UK, EU & EEA member states, plus our holiday destinations of Turkey, Egypt, Israel, Morocco, Switzerland, and Tunisia. There are a small number of suppliers established in the USA, Albania; Estonia; Israel; Jordan; Serbia; Hong Kong; Cayman Islands; Brazil; United Arab Emirates; India, Gibraltar, Norway, Iceland, Republic of Korea, Montenegro, Republic of North Macedonia, Canada, Australia, French Guiana and Eswatini.

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

### **(i) Governance**

The Board sets the tone at the top, demonstrating our commitment to ethical behaviour and doing the right thing. Our Code of Business Ethics sets a clear behavioural framework, consisting of Safety First, Integrity, Avoidance of Conflicts of Interest, Compliance with Laws and Whistleblowing.

The Airline Management Board ("AMB") has a clear strategy for '*Making low-cost travel easy*' and winning for our customers, our shareholders and our people. As part of this strategy, our approach to Modern Slavery includes effective management oversight and a policy framework, as detailed below.

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

The Modern Slavery Working Group is responsible for the development and implementation of our Modern Slavery strategy. It was established in 2016 and includes senior management from relevant functions across the business, including Legal, HR, Procurement, Sustainability, Cabin Crew Operations, Crew Training, Ground Operations, Security and easyJet Holidays. The working group meets formally around 4 times per year. There are also regular discussions throughout the year on the effectiveness of our Modern Slavery strategy (including recommendations on areas for improvement).

Our Business Integrity Committee works closely with the Modern Slavery Working Group and oversees our whistleblowing hotline for Modern Slavery, 'Speak up, Speak Out' ("SUSO"), and our SUSO Policy. This Committee is also responsible for identifying trends raised through SUSO and ensuring that appropriate action is taken to address any issues.

As detailed in *Section IV (i)* below, a member of the Business Integrity Committee is also part of the Modern Slavery Working Group and informs the group of any incidents raised regarding Modern Slavery. The Modern Slavery Working Group then decides how to take those incidents forward, in line with the SUSO Policy.

An overview of the SUSO cases is presented to the Audit Committee quarterly, as part of the risk and assurance reporting. Additionally, the entire Board reviews and approves the Modern Slavery statement on an annual basis.

- Our policies

As reported in our previous statements, we have specific policies on Human Rights and Modern Slavery, non-discrimination, health and safety, anti-bribery and whistleblowing. During FY23, we reviewed our [Human Rights & Modern Slavery Policy](#) to ensure it provides sufficient assurance and is still fit for purpose.

In FY23, we also updated our [Supplier Code of Conduct](#), providing our suppliers with access to SUSO. The Supplier Code of Conduct, which applies to the easyJet Group, requires our suppliers to comply with certain social and environmental principles (and to ensure that their sub-contractors also comply). These include ensuring fair treatment of employees, a respectful working environment; respect of human rights; and prohibition of any form of Modern Slavery or bribery. Our suppliers are also required to comply with the United Nations International Bill of Human Rights, the International Labour Organisation's Core Conventions and Declaration on Fundamental Principles and Rights at Work; and the United Nations Guiding Principles on Business and Human Rights.

We publish our policies and Supplier Code of Conduct on our internal intranet site; and include the details of those policies within our mandatory training programmes. Since 2022, we have also published our ethical policies and Supplier Code of Conduct externally on our corporate website.

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

## **(ii) Stakeholder engagement**

In December 2022, the easyJet Holidays Customer & Operations Director succeeded the Director of Sustainability as a member of the Global Sustainable Tourism Council ("GSTC") Board. Further information on the role of the GSTC is set out below in *Section IV (iv) – Accommodation Suppliers*.

We have partnered with UNICEF for the past 12 years supporting a variety of projects and raising over £17m. In FY23, this has included collecting over £850,000 for UNICEF's appeal for children in Ukraine and its global Children Emergency Fund and Education campaign.

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

During FY23 we worked with over 1,800 direct suppliers (plus hotel accommodation suppliers, as explained in the *Section IV (iv)*), as well as a large indirect supply chain. We expect all our suppliers and partner organisations (and their own supply chains) to operate to the highest standards and share our values and respect for human rights.

### **(i) Supplier Code of Conduct**

Our Supplier Code of Conduct has been incorporated into contracts with suppliers. For easyJet Holidays, the Supplier Code of Conduct - along with information on SUSO - is included in contracts for accommodation, transport and ground handling services.

### **(ii) Contract clauses**

Where appropriate and on a risk-based approach, our supplier agreements include Modern Slavery clauses. When incorporated, these clauses may include a requirement to comply with the Act, internationally recognised standards and easyJet's Supplier Code of Conduct or equivalent; information and notification rights; the right to conduct audits; access to SUSO; and remediation rights.

### **(iii) Compliance Questionnaire and Procurement Guidance**

Our Procurement team regularly receives training and support to manage risks relating to human rights and Modern Slavery. We have created a detailed guidance pack designed to help the Procurement team conduct a risk assessment, which includes information on the process that must be followed to mitigate any risks identified.

A key part of this process is our Compliance Questionnaire, which is used in the supplier tender process and embedded in our e-sourcing system. It comprises multiple questions for the supplier to provide detailed information on 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. Any specific risk identified through the supplier's responses to the Compliance Questionnaire is addressed directly with the supplier either contractually and/or through further due diligence, as appropriate. The guidance pack produced for the Procurement team also provides information on how to respond to any red-flag responses to the Compliance Questionnaire.

### **(iv) Supplier Visits**

In FY23, our Contact Management Centre Risk Team introduced a formal Modern Slavery audit process for our Contact Centre service providers. The approach applies to all countries within which we operate, with additional onsite checks for sites within high-risk countries (including South Africa, Morocco and India). The latest onsite visits during FY2023 were in September 2023, and the onsite checks for FY2024 have already started. During these visits, workers are randomly picked and questioned about their employment conditions, how they are recruited, the retention of their personal documents and the compensation for extra hours. Additionally, we hold forums for employees at all levels to voice concerns without management being present. These checks did not result in any concerns or risks regarding Modern Slavery.

## **IV. Our Risk assessment and management**

### **(i) Our organisation**

We have clear processes in place to deal with any report of a Modern Slavery incident in our Group activities and our supply chain. Currently, reports can be raised in two main ways, via SUSO or via SafetyNet, our internal safety management system. Regarding SUSO, reports are triaged based on the topic, including Modern Slavery. Any incidents are raised at the Modern Slavery Working Group and an investigation plan will be put in place, in line with our SUSO Policy.

As to SafetyNet, these types of reports are generally raised by our crew and are reviewed by the Safety Team, who may allocate the investigation to the appropriate department, depending on the issue. These reports may be passed on to enforcement agencies for investigation (and we as easyJet Group will then continue to assist where appropriate).

We are constantly reviewing whether any changes can be made to improve our processes.

### **(ii) Our supply chain assessment**

In FY23 we formed a cross-functional working group to map and review the existing controls and assurances on key applicable Environmental, Social and Governance (ESG) risks regarding third parties, including Modern Slavery. We then engaged external advisors to identify any possible improvements and prepare an implementation roadmap. We are currently in the process of implementing those recommendations, including risk segmentation, ensuring risk mitigation and remediation plans are in place (where needed); and establishing a process for ongoing monitoring.

### **(iii) Our supply chain**

We have continued to make improvements in centralising the data we have available on all our suppliers. Our new supplier directory enables us to produce reports on the Modern Slavery risk ratings recorded against each supplier.

The risk rating given to each new supplier is based on industry sector and geographical location of production or service. We also use the Global Slavery Index to support our analysis of geographic risks, based on the prevalence of Modern Slavery or other labour rights violations in each country. The categories of goods and services were reviewed and updated in FY23 using the latest publication of the Global Slavery Index.

Within the high-risk industries/sectors indicated in *Section I (ii)*, we treat the following sub-categories of our Procurement process as high risk:

- **Airport Services:** covering Ground Operations.
- **Engineering:** covering Aircraft Appearances and Logistics.
- **Information Technology:** covering Airport Services; Development and Testing; Hardware Third Party Resources; Hosting and Networks; Licences; Software Delivery and Systems Management; Software Third Party Resources; and Telephony.
- **Operations:** covering Crew, Disruption and Outsourced Services.
- **Partner & Inflight:** covering flight Services.
- **Property and Facilities:** covering Catering Services; Facilities Management and Logistics
- **Travel & Events:** covering Travel.

We currently have around 300 suppliers operating in high-risk industry sectors and/or high-risk countries (excluding hotel accommodation suppliers, which are managed separately). This number is based on the information we have recorded in our Supplier Directory. We are looking to implement further due diligence and enhanced processes to identify any additional high-risk suppliers and ensure effective ongoing monitoring.

#### **(iv) Accommodation Suppliers**

We are currently focusing on the hotels offered by easyJet Holidays, as part of our wider sustainability strategy, and the important role of the GSTC, the Global Sustainable Tourism Council. The GSTC provides a global standard for sustainable travel and tourism; and formal recognition for sustainable tourism Certification Bodies (which audit against the GSTC standards).

easyJet Holidays is a member of GSTC and has committed to support its hotel partners to achieve certification by a GSTC accredited certification body or recognised standard. In FY23, easyJet Holidays sponsored GSTC sustainable tourism training for 160 of its hotel partners in Spain, Greece and Turkey. This course gave attendees the opportunity to achieve a Professional Certificate in Sustainable Tourism and provided in depth knowledge of the GSTC criteria used by certification bodies.

One such certification body is Travelife - a leading training, management and certification initiative for tourism companies committed to sustainability. Human rights and Modern Slavery form part of the audits carried out by Travelife (and other certification bodies recognised by GSTC). All direct contracts with easyJet Holidays accommodation suppliers encourage hotels to obtain and maintain Travelife Gold certification (or from another GSTC recognised certification body). We have a dedicated webpage featuring hotels which are certified. easyJet Holidays also continues to promote on its website those hotels that have achieved this certification.

In FY23, easyJet Holidays also sent our Supplier Code of Conduct to all directly contracted hotel providers as part of its 'Hotel Manual'. The Hotel Manual sets out easyJet Holidays' expectations around Modern Slavery. These expectations are that nobody working in the hotel, or its' supply chain is exploited or working against their will; that the 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**

As a Group, we use a number of key performance indicators to assess and measure the effectiveness of our Modern Slavery strategy, including the number of high-risk suppliers, the number of reported suspected incidents, the number of staff trained, non-compliances found through due diligence, the number of SUSO cases and the number of investigations carried out by our Security team relating to Modern Slavery.

### **(i) Supplier Directory**

Work is ongoing to improve the profiles we hold on suppliers in our central contract database, and to ensure that all copies of supplier contracts are uploaded on our Supplier Directory.

### **(ii) Suspected incidents**

In FY23, we did not receive any reports of a Modern Slavery incident in our supply chain. Our Cabin Crew reported 16 suspected human trafficking incidents in FY23. These incidents were assessed and acted on by the crew and pilots according to the company procedures in place at that time.

### **(iii) Training**

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 and increase confidence in reporting suspected cases. We have also launched a new eLearning module for our Management & Administration ("M&A") employees.

### **(iv) Investigations**

Our Security and Data Protection teams continue to collaborate with the relevant Authorities in various countries and our Security team are engaged with Police Trafficking Teams across easyJet's network. In FY23, the Data Protection team supported 7 requests for information from UK and European authorities in connection with human trafficking.

## **VI. Modern Slavery training and awareness**

In April 2023, when we published our last Modern Slavery Annual Statement, we promoted awareness of Modern Slavery with an article in our 'Weekly News' to around 17,000 employees.

Additionally, in July 2023 we recorded an internal podcast discussing Modern Slavery and Human Trafficking, and the role of our employees in spotting any issues. This recording was published on our intranet and distributed in our Weekly News to head office staff, reaching an audience of nearly 3,000 people. 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 SUSO.

### **(i) Crew Training**

For all airlines and transport providers, there is a risk that their services may be used by human traffickers. We recognise that our Cabin Crew and Ground Crew are in a position to identify and report suspected cases.

In FY23, 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 was delivered to c.8,500 Cabin crew and over 400 new Flight Crew during FY23. The training was also delivered to 680 of our existing Flight Crew during that period and it will continue to be rolled out in 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 both on board the aircraft and on the ground. The training contains case study examples and explains the actions to be taken if concerns arise.

In 2022, the training material for Ground Crew was updated and made available through our Connected Portal to Ground Handlers. Ground Handler trainers deliver this training to new Ground Crew and it is available for all providers to ensure staff are adequately trained.

**(ii) Management & Administration ("M&A")**

We have a mandatory eLearning module on Modern Slavery for all employees in our M&A community. In FY23, c.700 new starters completed the training. We have recently designed a new Modern Slavery mandatory training module with external providers, which will launch in early 2024. This will have content targeted to the latest specific risk areas, case studies and an assessment.

**Next steps**

We will continue to assess the risk of Modern Slavery in our 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 these risks.