

Jet2[®] plc

Supplier Code of Conduct



Introduction

Jet2 plc is the home of: **Jet2holidays** – the UK’s leading provider of ATOL protected package holidays to leisure destinations across the Mediterranean, Canary Islands and European Leisure Cities; and **Jet2.com** – our award-winning leisure airline, which specialises in scheduled holiday flights

We take immense pride in delighting our Customers during their well-earned holiday breaks with us and we also recognise the importance of strong relationships with our many stakeholders in helping us to realise our future growth plans. We know that Suppliers who deliver a great service enable us to continue to provide an award-winning, VIP experience to all our valued Customers.

We very much believe our Suppliers are partners, and we want to work together with them to build mutually beneficial long-term relationships. Consequently, we expect our Suppliers both in the UK and overseas to share our values, to act with fairness, respect and integrity and to help us maintain a competitive cost base, all of which will assist us in achieving our ambitions.

This way of working allows us to recognise and reward you for your commitment to, and continued support of our core principles, and we will ensure that you understand our medium to long-term objectives so that you can align your business strategies to support, grow and succeed with us.

The Code of Conduct sets out the minimum standards, expectations and behaviours that we require from all our Suppliers, who must ensure they are followed, including by their own colleagues and supply chains (as applicable).



To all our valued Suppliers,

Jet2.com and **Jet2holidays** continue to succeed in a very competitive market because of the tireless team work to deliver our famous “*Customer First*” approach, while delivering the very highest standards of compliance, governance, safety and security.

As we continue to grow, so does our reliance on you to help us maintain those high standards, and ultimately provide a consistently excellent customer experience across multiple locations and business activities.

It is important for all our Suppliers to understand our strategy and the many challenges our Colleagues face in delivering a market-leading product. By working closely together, we can harness your product and market knowledge to help us improve our own service, enhance the perception of the **Jet2** brands and make sure we create wonderful memories for Customers, both existing and new.

Actions that our Supplier partners take (or don’t take) can enhance or hinder our own service delivery and the resilience of our operation - therefore it is crucial that everybody is on board and clear on expectations.

By following this **Jet2** Supplier Code of Conduct, I very much hope we can work together to avoid issues, mitigate risk and maximise the benefits for all at every opportunity.

Your continued support is greatly appreciated.

A handwritten signature in black ink, appearing to read 'Steve Heapy'.

Steve Heapy

CEO Jet2.com and Jet2holidays



Our Values

Jet2 is committed to its core principles: to be family-friendly, to offer value for money and to give great customer service to ensure every **Jet2.com** and **Jet2holidays** customer enjoys a truly VIP experience. We are all Customer Helpers working as One Team to Create Memories that our Customers will want to talk to their friends and family about. We want our Customers to come back to us time and time again, which is reflected in our **Take Me There** values, which we expect all our Suppliers to share in:

Create Memories

We're here to Create Memories for our Colleagues and our Customers, from ensuring a swift and safe journey, right down to the little details that mean so much. And we make working here a memorable experience for each other too. We're proud to be friendly, approachable, open and honest.



Be Present

We're always aware of what's going on around us, both in and out of the workplace. Whether that's comforting a nervous customer, welcoming a new colleague on board or asking one of our Customers if they need a hand. We're always present and every colleague is empowered to use their initiative to inspire others.



Work as One Team

We're working together to deliver that amazing journey to millions of customers. From customer facing roles on the ground and in the air, to all the behind the scenes activities that keep our Customers happy and ensures our growth and success, making our Colleague and Customer journey seamless. We couldn't do it without our people. We are proud to be One Team.



Take Responsibility

We always think about what we do and how this impacts both our Colleagues and our Customers. We empower our Colleagues to take responsibility, and if there's a problem, we find a solution. If there's something we can do better, we do it.



Required Behaviours

- ✈ **Standards:** Our Suppliers must always act lawfully, ethically, honestly and with integrity.
- ✈ **Great value service:** We provide “friendly low fares” and excellent value for our Customers. We therefore expect our Supplier partners to help us achieve this by being fair, competitive, reasonable and transparent in setting pricing and to continually look for ways to improve efficiency and reflect those improvements in the cost of supply.
- ✈ **Invoicing:** We recognise the importance of paying our Suppliers on time and in full and are proud of our excellent average payment times (which we report on in accordance with the UK's ‘Duty to report on payment practices and performance’ legislation). To help us do this, we need Suppliers to invoice as agreed, on time, accurately, and with enough supporting information to allow us to validate the amounts being invoiced.
- ✈ **Expenses:** We will only pay expenses where expressly agreed in writing. Any expenses passed on to us must always be suitably evidenced, approved in advance, reasonable in amount, and necessarily incurred in the proper performance of your duties.
- ✈ **Conflicts of interest:** We expect Suppliers to identify and manage conflicts of interest to ensure that the influence of third parties or other interests does not compromise what they do for us. Suppliers must have the necessary controls and processes in place to ensure that ‘related party transactions’ are identified before any commitment is made.
- ✈ **Quality:** We expect Suppliers to meet or exceed any agreed service levels or KPI's and act in all respects in line with industry best practice and performance must be monitored and managed through regular supplier review meetings.



Compliance

- ✈ **General compliance:** Our Suppliers must comply with (and support our compliance with) all applicable laws and regulations, and any relevant rules, guidance and standards of any regulator, authority or industry body (including the UK CAA, DfT and ABTA).
- ✈ **Tax compliance:** We require our Suppliers to comply with applicable tax legislation and reporting and payment obligations, in a timely and accurate manner. This includes having suitable tax accounting systems and robust controls and processes in place, and maintaining all necessary records and documentation as appropriate.
- ✈ **Competition law:** Suppliers must comply with all applicable competition laws, including (but not limited to) laws relating to information sharing with competitors, price fixing, market sharing and rigging bids.
- ✈ **Bribery and corruption:** We have a zero-tolerance approach to bribery and corruption. All our Suppliers must comply with applicable anti-money laundering rules and regulations, including the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977 or any other applicable national anti-corruption regulations and legislation. Suppliers must not accept, offer, promise, pay, permit or authorise:
 - a. bribes, facilitation payments, kickbacks or illegal political contributions;
 - b. money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage; or
 - c. any other unlawful or improper payments or benefits.
 - d. Suppliers must notify us as soon as possible if they become aware of or suspect any non-compliance with any of the above.
- ✈ **Slavery, human trafficking and child labour:** The UK's "Modern Slavery Act" requires us to publish an annual slavery and human trafficking statement. The latest statement can be found here - **Modern Slavery Act**. We have a zero-tolerance approach to slavery and human trafficking and expect our Suppliers and their supply chains to uphold the same values. We will not conduct business knowingly with anyone engaged in slavery or human trafficking practices, or knowingly permit them to be carried out in any part of its business. Suppliers must notify us as soon as possible if they become aware or suspect any non-compliance with any of the above.
- ✈ **Sanctions and Restricted Trade:** We expect our Suppliers to ensure that their activities comply with sanctions regimes implemented under UK sanctions law and the United Nations Security Council Sanctions Regime.



Colleagues

- ✈ **Health safety and welfare:** We expect our Suppliers to look after their colleagues, and to treat them fairly and with respect.
- ✈ **Diversity, equality and inclusion:** We employ a diverse workforce in the UK and Overseas and are committed to promoting diversity and ensuring the equality of opportunity for all within the workplace. We do not tolerate any discriminatory practices, and we require all our Suppliers to do the same.
- ✈ **Staff policies and procedures:** All our Suppliers should have and should implement suitable policies for personnel including policies on confidentiality and expected conduct and behaviour in the workplace.
- ✈ **Suitability of staff:** Suppliers must take responsibility for ensuring they have appropriate policies and procedures in place to check the suitability of new and existing staff, and to continue to assess suitability on an ongoing basis. This is especially important for higher risk activities including interaction with **Jet2's** Customers or Colleagues, "airside" access or access to our aircraft, handling sensitive or personal information and access to our premises or systems.



Safety and Security

- ✈ **Aviation security:** As aviation is a high-profile industry, it is vital that we protect our aircraft, Colleagues and Customers from any acts of unlawful interference. To ensure high security standards we comply with mandated legislation and regulations from the various countries we operate in. It is therefore imperative that our Suppliers implement appropriate measures to ensure compliance with security regulations appropriate to their country of operations. Consequently, we expect a proactive approach to security, including robust vetting and monitoring of staff, high standards of security vigilance and a reporting mechanism for security concerns or breaches.
- ✈ **Health and safety:** We operate a robust safety management system based upon a 'Just Culture' which provides an environment where all Colleagues are encouraged to report and submit safety related issues. We expect our Suppliers to provide a safe, healthy, and sanitary working environment and comply with applicable health and safety laws and any other relevant laws where we operate. This includes implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries, or any injuries to customers. All Suppliers must supply on request any reasonable supporting documentation, such as but not limited to: risk assessment; method statements; evidence of training or competency; and evidence of procedures and safe systems of work in support of any activities undertaken in relation to any work being conducted or services being provided.
- ✈ **Our premises:** All Suppliers must observe, and ensure that their personnel observe, all health and safety, security and other rules and requirements that apply at any of our premises, or when operating near our aircraft, IT systems or other assets.
- ✈ **Safety standards and marking:** We expect our Suppliers to ensure that any products supplied meet the relevant regulatory standards for the country of supply. If a product is manufactured outside the UK (or EEA), a product should bear UKCA (CE) marking if it comes under the scope of a directive requiring UKCA (CE) marking.
- ✈ **Cyber Security:** Cyber and data security is of paramount importance, not just to keep our Customers' and Colleagues' personal data safe, but also for reasons of aviation safety, security and resilience. There are various laws, regulations and industry standards which require us and our Suppliers to meet certain cyber and data security standards, including UK and EU data protection laws, the UK Civil Aviation Authority's ("CAA") Cyber Security Oversight Process for Aviation as described in CAP 1753 (<https://www.caa.co.uk/Commercial-industry/Cyber-security-oversight/Cyber-security-oversight>) and the UK's "Single Consolidated Direction" (aviation) which sets out more stringent measures to the common basic standard on civil aviation security applicable to the UK under Article 6 of Regulation (EC) No 300/2008.

All our Suppliers (and especially those who access or provide our IT systems or process our data) must implement appropriate cyber, information security and data security standards, and comply with any applicable contractual, legal and regulatory obligations and must proactively apply appropriate and proportionate cyber security good practice. Suppliers must notify us as soon as possible if there is a breach (actual or suspected) of any of the above.

Our Customers

- ✈ **Customer interactions and required behaviours:** We relish the trust our Customers place in us to give them a fantastic holiday experience and our "Customer First" strategy has remained consistent and is at the heart of everything we do. Consequently, we expect our Suppliers to go the extra mile to help ensure that each of our Customers has a VIP experience when they go on holiday with us.



Sustainability and the Environment

- ✈ We endeavour to operate in the most efficient and environmentally responsible way possible, minimising both emissions and carbon intensity (emissions per unit of product delivered). We believe that efficient operations also help to minimise our environmental impact on noise and air quality pollutants. We expect our Suppliers to share these values and act in the same way.
- ✈ Our vision is to become "one of the leading brands in sustainable air travel and package holidays". Having signed both the UK aviation Net Zero 2050 pledge in 2020 and the European aviation industry equivalent, we have implemented our own more ambitious targets to ensure our Customers can enjoy Real Package Holidays from **Jet2holidays** or scheduled holiday flights with **Jet2.com** that are more environmentally sustainable. We expect our Suppliers to share in these values.

Our Brands

- ✈ Suppliers must only use our brands or trademarks where we have given written permission to do so and any approved use must always be in accordance with our brand and usage guidelines or instructions.

Jet2.com
Friendly low fares

Jet2holidays
Package holidays you can trust

INDULGENT ESCAPES[®]
by Jet2holidays

Jet2CityBreaks
flight | hotel | city

VIBE
BY Jet2holidays

Jet2Villas
flight | car | villa

Data & Confidential Information

- **Confidentiality:** Suppliers must only use our confidential information for its proper purpose and must keep our confidential information or that of our Customers and business partners from being disclosed to any person who does not need or have a right to that information.
- **References to Jet2:** Suppliers must not reference us in their marketing/promotional materials or disclose that they are our supplier or partner without our written permission.
- **Personal data and data protection:** Suppliers must comply with all data protection laws and requirements (including the UK GDPR) when processing any personal data on our behalf and not use any personal data unless expressly agreed by ourselves. Unless otherwise agreed with us, personal data must not be sent outside the UK/EEA or shared with any third parties without our consent.



Holiday House
Ingram Row
Leeds
LS11 9AW

+44 (0)800 408 5599

www.Jet2plc.com

www.Jet2.com

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