



SUPPLIER CODE OF CONDUCT

RYANAIR'S SUPPLIER CODE OF CONDUCT

Ryanair Group ("Ryanair") is committed to doing business with customers, suppliers, and other parties in a way that is fair, honest, transparent and benefits everyone involved. We support the 2015 Paris Agreement, Destination 2050, the United Nations Global Compact and the 17 UN Sustainable Development Goals.

We are committed to sourcing goods and services responsibly. This Supplier Code of Conduct ("Code") sets out our expectations on those who provide these goods and services to Ryanair and compliments our Code of Business Conduct & Ethics. The Code is informed by UN Guiding Principles on Business and Human Rights and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.

PURPOSE & SCOPE

We want to deal with suppliers who demonstrate good Environmental, Social and Governance standards. The purpose of this Code is to set the expectations we have for Ryanair's suppliers.

Ryanair suppliers are expected to comply with this Code, in addition to the requirement, in their supplier agreement(s) with Ryanair, to comply with applicable laws, regulatory requirements and applicable Ryanair policies.

We define suppliers as third-party organisations that provide goods or services to or on behalf of Ryanair. This includes suppliers' officers, employees and third parties sub-contracted by a supplier.

This Code does not apply to individual contractors, agents or intermediaries.

HEALTH & SAFETY

Safety is at the centre of everything Ryanair does, and we expect Ryanair suppliers to operate in a manner which is safe and in compliance with applicable safety legislation. Suppliers should:

- provide a safe work environment abiding by local laws and regulations, respecting the health and wellbeing of staff and any subcontractors;
- identify hazards and take mitigating actions to reduce these hazards. Risk identification should take place periodically;
- ensure all staff work within safe and humane conditions, including providing adequate training and effective protective equipment required to safely carry out their duties;
- construct and/or maintain facilities in accordance with applicable laws and regulations;
- ensure accommodation, where provided, is clean, safe and meets the basic needs of workers while respecting their dignity; and
- suppliers should also ensure that there are appropriate exits, procedures and equipment in place to deal with emergency situations.

For more details please see [Ryanair's Code of Business Conduct & Ethics](#).



ENVIRONMENTAL & ENERGY MANAGEMENT

We understand that every business has an environmental footprint, however we expect suppliers to recognise the climate crisis and other environmental challenges, and work on ways to mitigate their impact. Therefore, we encourage our suppliers to:

- support Ryanair in achieving its Pathway to Net Zero and other environmental targets incl. becoming plastic free, Sustainable Aviation Fuel goals, etc.;
- carry out operations with care for the environment and at a minimum comply with applicable environmental laws and regulations;
- have a clear Environmental Policy which is appropriate and relevant for their operations;
- make progressive improvements in their operations and through adoption of good operating practices, ensure the responsible use of natural resources, cleaner production, pollution prevention and the creation of products with lower environmental impacts;
- where appropriate, set/develop emissions reduction targets aligned with the Science Based Targets initiative (SBTi);
- develop/support any innovation and collaboration opportunities that would help Ryanair achieve its near-term SBTi Target, Pathway to Net Zero, SAF targets and support sustainable aviation. Depending on the potential impact of these, such opportunities may be rewarded with increased expenditure and engagement; and
- not trade in Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) listed species.

NON-DISCRIMINATION

Ryanair's suppliers should understand our commitments in relation to inclusion and diversity. Suppliers should:

- not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class;
- not physically abuse, verbally or sexually harass or intimidate its staff; and
- have adequate policies and procedures in place to protect staff from discrimination, including appropriate channels to have concerns addressed.

HUMAN RIGHTS

We expect our suppliers to respect human rights, both of their own workforce but also those in their own supply chain. Supplier should:

- respect the human rights of their employees and comply with all relevant legislation, regulations and directives in the countries and communities in which they operate;
- prohibit the use of child labour. No child below the age for finishing compulsory schooling, or 15 years of age (whichever is the greater) may be employed by a supplier, subject to ILO exceptions;
- where people under the age of 18 are employed, ensure that their work is not likely to be harmful to their health and/or development and ensuring compliance with all applicable laws;
- prohibit the use of forced or involuntary labour of any type (i.e. slave, forced, trafficked, indentured or involuntary prison labour);
- not restrict worker's freedom of movement, require workers to remain at the workplace after the conclusion of their working hours or confine them in any worker accommodation;

- give staff the right and ability to leave employment if they choose;
- implement effective measures to protect migrant employees against any form of discrimination;
- develop and implement mechanisms for resolving industrial disputes, including employee grievances, and ensure effective communication with employees and their representatives;
- inform workers about their employment terms and conditions in writing and in an understandable manner before they enter employment;
- ensure that their employees are fairly compensated. At a minimum, compensation must comply with all applicable wage and hour laws;
- provide for working hours that comply with national laws. Regular hours worked shall not typically exceed sixty hours per week, (including overtime) and workers will be provided with one day off in every seven-day period; and
- comply with the Modern Slavery Act 2015 (UK), Criminal Law (Human Trafficking) Act 2008 (Ireland) & Criminal Law (Human Trafficking) (Amendment) Act 2013 (Ireland).

BRIBERY & CORRUPTION

We expect our suppliers to:

- have zero tolerance when it comes to bribery and corruption;
- prohibit the offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments;
- disclose any personal relationships, economic interest or other ties to their business held by an employee or contractor with Ryanair; and
- take appropriate measures to secure and protect all confidential information related to its relationship with Ryanair and use it only for the purpose authorised under contractual agreement. This obligation shall remain in force regardless of the status of the business relationship and into perpetuity.

For a full definition of what we mean by this, please see [Ryanair's Anti-Bribery & Corruption Policy](#).

HOW TO FOLLOW THIS CODE?

Suppliers are encouraged to:

- comply with this Code for the duration of their relationship with Ryanair;
- share the principles of this Code with their officers, employees and sub-contractors;
- report relevant data to Ryanair if requested;
- ensure fair and honest business with their stakeholders, including officers, staff, subcontractors and other third parties;
- explain if they are concerned about any actions or decisions that contravene the standards set out in this Code; and
- if concerned about any actions or decisions that contravene the standards set out in this Code, or have any questions regarding this Code, contact their Relationship Manager in Ryanair.

In return, from time-to-time, Ryanair will:

- engage with suppliers via webinars and training on how they can reduce their emissions; and
- conduct risk assessments and appropriate audits to assess compliance with the Code.

The provisions in this Code are in addition to and not in lieu of any legal agreement or contract.

COMPLYING WITH THE CODE

Suppliers should:

- have the appropriate processes and systems in place to adhere to this Code, including a means for the confidential reporting of concerns about misconduct or unethical behaviour and an appropriate mechanism to remedy adverse impacts;
- have an appropriate whistleblowing policy in place that allows whistleblowers raise concerns without fear of suffering negative repercussions. Similarly, suppliers shall not tolerate threats, intimidation, physical or legal attacks against human rights defenders; and
- report any concerns immediately about compliance with legal requirements or any aspect of this Code, to their designated point of contact in Ryanair or if unable to do this, through the Ryanair whistleblowing procedures.

Where suppliers are found to have contravened the requirements set out in this Code, Ryanair reserves the right to terminate any associated agreement or business relationship.

