

RYANAIR GROUP



SUSTAINABILITY STATEMENT 2025





SUSTAINABILITY STATEMENT

INTRODUCTION

Corporate Sustainability Reporting Directive

The Corporate Sustainability Reporting Directive (“CSRD”) entered into force on January 5, 2023 amending the existing Non-financial Reporting Directive (“NFRD”), modernising and strengthening the rules for sustainability reporting, which includes environmental, social and governance (“ESG”) aspects. CSRD ensures that stakeholders have the necessary information to evaluate the impact of companies on the environment and society and assess financial risks and opportunities related to sustainability issues. On July 31, 2023, the European Commission adopted a delegated regulation setting out the first set of European Sustainability Reporting Standards (“ESRS”) under CSRD with CSRD legislation being transposed into Irish law on July 5, 2024.

The Group is subject to CSRD and falls into the first tranche of entities required to report under CSRD for fiscal year 2025 (“FY25”). In accordance with section 1613 of the Companies Act, 2014, this Sustainability Statement has been subject to limited assurance review by PricewaterhouseCoopers, Chartered Accountants. There are elements outside the Sustainability Statement, included in the Group’s Annual Report that address some of the CSRD requirements. These elements are also covered by their limited assurance procedures and are clearly indicated by reference to the ESRS disclosure requirement in conjunction with Appendix 4 to the Sustainability Statement, where data points that are covering ESRS disclosure requirements are incorporated by reference to the Annual Report. Their limited assurance report is included on pages 107 to 109 and should be read in conjunction with this Sustainability Statement. Our reported metrics are subject to limited assurance procedures by our assurance provider and are not further validated by another external body unless specifically identified.

CSRD for the Group

As Europe’s largest airline group, Ryanair has an important role in shaping the future of sustainable aviation. The Group proudly support key initiatives such as the 2015 Paris Agreement, Destination 2050, the United Nations Global Compact, the 17 UN Sustainable Development Goals (“SDGs”) and our partnership with Trinity College Dublin (“TCD”) funding the Ryanair Sustainable Aviation Research Centre.

The Group must disclose its impacts, risks and opportunities (“IROs”) on the environment (“E”), society (“S”), and governance (“G”) as well as the actions taken to mitigate risks and negative impacts, and to enhance opportunities and positive impacts. Through this regulation, enhanced reporting and monitoring of progress towards sustainability targets as well as the policies and actions to support the transition is required.

BASIS OF PREPARATION

GENERAL BASIS FOR PREPARATION OF SUSTAINABILITY STATEMENTS

1. General basis for preparation

The Group's Sustainability Statement has been prepared on a consolidated basis with the scope of consolidation being the same as for the Group's financial statements. For more details regarding financial statements, see the "Notes to the financial statements" section of the Annual Report in its page 156.

The information contained throughout the report relates specifically to the Group's own operations and those entities which the Group has operational control over. Any information related to its upstream or downstream value chain is specifically identified as such. For more detail, please refer to page 6. The Group has availed of the phase-in provisions outlined in Appendix C of ESRS 1 - General Requirements to the extent that they applied to material topics and are allowable given Ryanair's average number of employees exceeded 750 during FY25. The list of transitional provisions used by the Group can be found in Appendix – "Table 63 - Phased-in provisions availed of in accordance with ESRS 1 Appendix C", on page 96. The Group has also availed of transitional provisions allowable under ESRS 1 in relation to the presentation of comparative information. The Group has not disclosed comparative information in respect of the previous period for quantitative metrics and monetary amounts reported in the current period. This provision is availed of for the first year of mandatory reporting of disclosures.

The Group's Sustainability Statement is prepared in accordance with Part 28 of the Companies Act 2014 and in compliance with the ESRSs issued by the European Financial Reporting Advisory Group ("EFRAG"). The Group has not used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation nor the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in articles 19a(3) and 29a(3) of Directive 2013/34/EU and Part 28 of the Companies Acts 2014.

1.1 Time horizons

The following time horizons are used by the Group in its sustainability assessments:

- Short-term – 0-1 year: In this time frame, the Group produces an annual budget (approved by the Board) where it reviews its planned schedule of flying for the next 12 months.
- Medium-term – 1-5 years: In this time frame, the Group has the ability to change certain aspects of its business strategy (e.g., new countries that it will fly to). Medium term risks represent a timeframe in which the regulatory environment evolves, the competitive landscape changes and customer preferences have the potential to shift, all of which impact on the business strategy and operations.
- Long-term – Greater than 5 years: In this time frame, the Group has the flexibility to change all aspects of its business strategy. Longer term risks are those that potentially impact on the Group's competitiveness through demographic and economic shifts.

1.2 Value chain estimation

For information on metrics that include upstream and/or downstream value chain data estimated using indirect sources, please refer to the "Methodologies" section, page 84.

Level of Accuracy

The Group's presentation of sustainability information may be subject to measurement uncertainty due to limitations in methodologies and data, including reliance on third-party data. The Group bases its estimates and methodologies on historical experience, available information, and various other assumptions that it believes to be reasonable. For more information, please see the "Level of Accuracy" section on page 93 in the Appendix.

Planned actions to improve accuracy

The expected increased use of sustainable aviation fuels ("SAF"), in the coming years, will see the Group collect data on lifecycle greenhouse gas ("GHG") emissions at an individual fuel batch level. This will improve the accuracy in reporting of indirect fuel emissions.

1.3 Sources of estimation and outcome uncertainty

There was no significant risk identified of a material adjustment to the carrying amounts of assets and liabilities reported in the financial statements relative to our material risks and opportunities within the next annual reporting period.

Please refer to the “Methodologies” section, page 84. The use of representative emission factors may contribute to ‘uncertainty’.

Actions to better understand non-CO₂ impacts

The Group believes it is important to advance the science on aviation’s non-CO₂ warming effects to reduce this current level of uncertainty. The Group will contribute to the European Commission’s Monitoring, Reporting and Verification (“MRV”) for aviation non-CO₂ emissions, whereby airlines report the non-CO₂ emissions of each individual flight.

2. Double Materiality Assessment

There are 12 binding ESRs with up to 120 mandatory non-financial Key Performance Indicators (“KPIs”) and additional qualitative disclosures. The starting point of sustainability reporting in accordance with CSRD and the ESRs is a mandatory Double Materiality Assessment (“DMA”). Conducting a DMA ensures that the Group reports all ESG topics that are relevant to its business activities, and also enables the Group to reduce its “reporting burden” by excluding certain topics that are proven to be immaterial for the Group and the social and natural environment in which it operates.

ESRS 1 and ESRS 2 are mandatory “cross-cutting” standards which the Group is required to report on irrespective of its DMA results. The remaining 10 topic specific standards covering Environmental, Social and Governance topics are subject to a DMA (i.e. those topics, sub-topics and, where relevant, sub-sub-topics, which are deemed as material following the Group’s DMA are required to be reported on under CSRD).

The material topics, sub-topics and sub-sub-topics are determined through identifying and assessing material Impacts, Risks, and Opportunities for ESG Sustainability Matters.

2.1 Methodologies and Assumptions

The Group has followed the May 2024 EFRAG Implementation Guidance for the Materiality Assessment in developing its DMA.

2.1.1 Scope

The Group has identified and assessed IROs across its own operations and value chain at a sub-sub-topic level.

A topic is material from an impact perspective when it relates to the undertaking’s material actual or potential positive or negative impacts on people or the environment over the short, medium, and long-term time horizons. This includes impacts on the environment, social and governance matters.

A topic is financially material if it triggers or may trigger material financial effects on the Group. This is the case when it generates or may generate risks or opportunities that have a material influence (or are likely to have a material influence) on the Group’s cashflows, development, performance, position, cost of capital or access to finance in the short, medium, and long-term time horizons.

2.1.2 Stakeholder engagement

The Group identified a variety of key stakeholders, based on stakeholder cohorts whose opinions and inputs would benefit the materiality process.

2.1.3 Scoring

Impact Materiality

The Group created a long list of positive and negative impacts (based on the ESRS topics), which was then communicated to stakeholders (internal and external) by survey or workshops. Based on the output of this engagement, the Group consolidated the results for each topic, scoring each impact against the criteria as outlined in the EFRAG Implementation Guidance for impact materiality, specifically: scale, scope, remediability and likelihood. An impact is deemed to be material if it reaches a predetermined threshold. The scoring is undertaken with consideration for the stakeholder engagement results and stakeholder views from interviews. For detail on the impact materiality scoring methodology, please refer to the “Scoring” section on page 93.

Financial Materiality

The financial materiality assessment appraises how significant sustainability topics (potential and/or actual) risk and opportunity could be on the Group’s financial results over the short, medium, or long term. The Group created a long list of risks and opportunities, which was communicated to stakeholders at a number of workshops. Based on inputs from these workshops, the Group’s initial work to understand the context and the survey results, the Group calculated a preliminary materiality score which considers stakeholder views. For detail on the financial materiality scoring methodology, please refer to the “Scoring” section on page 93.

Thresholds

The Group’s Enterprise Risk Management (“ERM”) Register highlights the financial risks and opportunities identified by the Group with its respective magnitude and likelihood. The ERM was used to guide the financial materiality scoring along with stakeholder interviews and surveys. For detail on the threshold, please refer to the “Scoring” section on page 93.

Risk management

The ERM assesses risks based on a matrix of the inherent likelihood of occurrence and potential financial or operational impact to the Group. Sustainability related risks are integrated into the ERM. For more detail, please refer to the “Risk management over sustainability reporting” section on page 21.

2.2 Process

The steps below were followed to help determine what topics meet the criteria of double materiality:

2.2.1 Understanding the Context - Top-Down Assessment & Identifying and Validating IROs

Through the review of the Group’s previously published Sustainability and Annual Reports, researching the Sustainability Statements of peers, media articles and relevant industry reports, and ESRS 1 Application Requirement 16, a list of topics was created in the form of an IRO longlist. This process focused on the core activities and geographies of the Group as outlined per the “Our Strategy” section.

The Group determined the relevant time horizons in which the IROs may materialise. See the “Time horizons” section on page 3.

The IRO longlist was discussed in IRO workshops with the Group’s Management. Discussions centred around the applicability of the IROs included in the longlist, as well as whether there were any IROs missing from the list. The Group then amended the longlist of IROs to incorporate comments arising from the review of the IRO longlist. As part of the DMA process and development of the long list of IROs, entity specific impacts, risks and opportunities were considered. These have not been deemed material.

2.2.2 Value Chain Analysis

To help understand the Group's value chain, the Group's stakeholders were mapped. Getting the feedback of these stakeholders is an important part of measuring Impact Materiality.

The Group mapped the relevant value chain ("VC") actors (see Table 1) for the Group based on two key criteria outlined in the VC Implementation Guidance issued by EFRAG, namely:

- Material Impacts (negative/positive) that the Group has on sustainability matters (under E, S & G); and
- Dependency of the Group on the VC actor.

Material Impacts

The Group determined whether its association with each actor in the VC may result in the Group having material impacts and risks, and whether these impacts are environmental, social, or governance-related.

Dependency

The Group determined whether its dependence on particular VC actors results in an exposure to financial risks or opportunities.

Details of how the Group assigned scores to potential material impacts is outlined on page 93 in the "DMA Methodology" section.

2.2.3 Stakeholder Analysis

Before assessing the individual IROs, relevant internal and external stakeholders were identified, as per the exemplary stakeholders mentioned in the ESRS 1 and the respective engagement inflow. Stakeholders are defined as those who are affected by or can influence the company's decisions and actions.

There are two main groups of stakeholders:

- Users of the sustainability information: Stakeholders interested in the Group's Sustainability Statement or information on the specific sustainability topic, e.g. investors, business partners, customers, the general public, media and civil society.
- Affected stakeholders: Individuals or groups who are or could be affected – positively or negatively – by the Group's activities and its direct and indirect business relationships across the value chain, e.g., employees or workers in the supply chain, local communities, customers and consumers.

The relevant stakeholders were identified by the Group's internal project team. This identification is in practice the same as the value chain mapping and business relationships.

The Group reviewed its consolidated balance sheet as reported in prior period Annual Report's to assess the completeness of the identified stakeholders, including the users of Sustainability Statements. The Group also reviewed industry reports to assess whether any other affected stakeholders were identified within these reports.

Based on this identification process, stakeholders representing different parts of the value chain were selected: Board of Directors, management, employees, the Audit Committee, customers, suppliers, airports, community and regulatory authorities/government.

The identified stakeholders were then prioritised to decide which stakeholders would be involved in the IRO workshops.

Each stakeholder was prioritised using two factors:

- Stakeholder influence on the Group; and
- Stakeholder dependence on the Group

The level of influence and dependency was scored on a 4-point rating scale with 1 being low influence/dependency and 4 being high influence/dependency. The final stakeholder prioritization score was the multiple of the influence score and the dependency score.

The list below shows certain stakeholders considered in stakeholder mapping and ultimately engaged with:

- **Suppliers/Contractors** – The top ten suppliers of the Group by spend.
- **Shareholders/Investors** – Those that, in so far as is known to the Group, are directly or indirectly interested in 5% or more of the issued ordinary share capital of the Group.
- **Members of the Audit Committee** – the Audit Committee is responsible for the Group sustainability agenda.
- **Senior Management** – The Executive Team responsible for the day-to-day running of the Group.
- **Sustainability Committee** – The Sustainability Committee covers all airlines within the Group and includes members from multiple areas within the organisation including Engineering, Finance, Labs, Operations and Sustainability.
- **Employees** – The Workforce Engagement NED engages with employees and gives at least quarterly feedback to the Board. Numerous panels are held annually with different representatives from across the Group incl. cabin crew, engineers, ground ops, labs team, office support staff and pilots.
- **Customers** – Surveys were sent to 500 randomly selected customers. Markets chosen from English speaking geographical market by revenue.

Table 1– Main Business Actors

Upstream Value Chain	Own operations	Downstream Value Chain:
<p>Suppliers</p> <p>Original Equipment Manufacturers (“OEMs”): The Group relies on OEMs for aircraft essential to its operations. Supply constraints could create a significant dependency with OEM order books full to the end of the decade. The Group’s association with OEMs may indirectly expose it to substantial impacts within the value chain.</p> <p>Jet Aviation Fuel Suppliers: The Group depends on jet fuel suppliers for operations. Although mitigation steps like tankering exist, replacing suppliers at certain locations is difficult. This dependency may expose the Group to risks and opportunities.</p> <p>Engine Manufacturers: The Group relies heavily on engine manufacturers. Their activities could expose the Group to considerable impacts within the value chain.</p>	<p>Workforce</p> <p>All Group employees and non-employees in the workforce, including aircrew, engineering, ground operations and office staff. For more information on the Group’s workforce, please refer to the “ESRS S1 – Own Workforce” section, page 50.</p>	<p>Airports and Air Traffic Management</p> <p>Key business actors for the Group include Air Traffic Management (“ATM”) and airport operators. The Group operates over 3,500 flights out of almost 230 airports per day. Given the nature of the Group’s business operations, association with airports is likely to result in the Group being exposed to material impacts. Airports pose impacts in relation to climate change, pollution, and ecosystems. The Group have a key dependency on ATM and airports within our business operations as the use of airports are critical to the Group’s operations.</p> <p>Distribution Channel</p> <p>The Group encourages passengers to make reservations and purchase tickets directly. Due to the Group’s long standing online distribution policy, the majority of reservations and purchases are made through its website (www.ryanair.com), although a significant number of customers are also booking on the Ryanair app. Additionally, in 2024, the Group entered into “direct distribution agreements” with several Online Travel Agents (“OTAs”) allowing them to market Ryanair flights to consumers.</p> <p>Consumers and End Users</p> <p>For information on the Group’s passengers please refer to the “ESRS S4 – Consumers and end-users” section of the Sustainability Statement, page 64.</p>

2.2.4 Stakeholder engagement and assessing materiality

After identifying and prioritising stakeholders, surveys were issued and/or interviews held with the respective stakeholders to help determine impact materiality.

Once results were processed and analysed, IROs were scored in line with the scoring methodology set out in the May 2024 EFRAG Implementation Guidance for the Materiality Assessment.

- **Method 1 (Surveys):** To score IROs the Group engaged with customers, shareholders/investors, suppliers/contractors, employees, Senior/Middle management, and the Audit Committee to identify ESG priorities.
- **Method 2 (Interviews):** To further score IROs, the Group interviewed members of the Group Audit Committee and academics from TCD who contributed to the identification of key IROs. The members of the Audit Committee also completed a survey.

2.2.5 Validation and Approval

Once the scoring of the impact and financial materiality was complete and a list of material sustainability topics was determined, IRO scoring was validated in a workshop with the Group's Sustainability Committee. This process is integrated in the Group's overall management process (see the "Management of IROs" section) and the decision-making process (see the "Sustainability Governance" section).

2.2.6 Outcome

After the results were validated by internal and external stakeholders and senior management, the results were categorized. The result of the identification and assessment of IROs was a list of 13 topics material to the Group, details of which are outlined in this statement (see Figure 1).

As a general principle, IROs are considered gross (i.e. before any mitigating actions) in the materiality assessment. This is linked to the objective of providing information on the management of IROs by the Group over time. Workers in the Value Chain was a topic for consideration through the DMA process and we consulted with stakeholders ahead of determining that this was not material at Group level. Consideration was given to the Group business model and the transactions undertaken. Consideration was also given to the overall governance policies and procedures in place, including those around suppliers.

Water and marine resources along with biodiversity and ecosystems were topics for consideration through the DMA process and we consulted with stakeholders ahead of determining that these were not material at Group level. This included consideration and assessment of dependencies. Our assessment of these topics included a high-level consideration and assessment of our operations, including assessment at own site locations, and key activities across the value chain. Based on this assessment, further engagement with affected communities was not necessary.

Specifically considering biodiversity, the Group is not considered or assessed to operate in biodiversity sensitive areas. This is based on an assessment which considered transitional and physical risks as well as considering systemic risks. It has been concluded that it is not necessary to implement biodiversity mitigation measures.

Furthermore, with regard to non-GHG emissions, the Group does not have a key dependency on communities within its operations as per the output of the DMA. Further research is required to better understand the impact on communities from non-GHG emissions. Resource inflows, outflows and waste were considered as part of the output of the DMA, where it was identified that the only material risk identified is resource scarcity, specifically in relation to jet fuel. Based on this assessment, further engagement with affected communities was not necessary.

Figure 1 – 13 ESRS Sub-Topics

E. Environment				S1. Own workforce				S4. Consumers & end users				G1. Business conduct			
	I	R	O		I	R	O		I	R	O		I	R	O
Climate change adaptation				Own Workforce: Working Conditions				Personal safety of consumers and/or end-users				Corruption & bribery			
Climate change mitigation				Own Workforce: Equal Treatment and opportunities for all				Information-related impacts for consumers and/or end-users				Corporate Culture			
Energy												Protection of whistleblowers			
Pollution of Air												Management of relationships with suppliers including payment practices			
Resource Inflows															

The table shall be read in conjunction with the detailed IROs in the topical sections.

2.2.7 Impacts, Risks and Opportunities Management

The material ESRS sustainability topics and IROs were mapped in order of impact and financial materiality and have been displayed in tables within each topical section. These tables describe the material IROs including the time horizon and place in the business model in which the IRO may materialise.

The process to identify material IROs in relation to business conduct matters has been disclosed through reference to ESRS 2 General Disclosures. The DMA identified the following business conduct topics to be material to the Group:

- Corporate Culture including its Code of Business Ethics & Conduct (2025);
- Management of relationships with suppliers including payment practices;
- Corruption & bribery; and
- Protection of Whistleblowers.

The Group's corporate culture strategy has been designed to enhance the positive impacts and opportunities while mitigating the risks identified through the DMA process.

The "Business Conduct" section details how the Group manages these material topics, see page 74.

Climate Scenario Analysis

A scenario analysis allows companies to assess the potential risks and opportunities to its business and operations that results from Climate Change. Risks and opportunities are assessed across:

- Physical Risks – location specific risks that arise when natural systems are compromised, due to the impact of climatic events (e.g., extremes of weather); and
- Transition Risks – risks that result from a misalignment between a company's strategy and management and the changing regulatory, policy or societal landscape in which it operates.

To support its DMA, in FY25, the Group reviewed its Climate Scenario Analysis ("Scenario Analysis") (originally conducted in FY23). The Scenario Analysis has informed the Group's strategic decision-making and climate change risk and opportunity identification, assessment and management. The Scenario Analysis integrated recommendations from the Task Force on Climate-Related Financial Disclosures ("TCFD"), CSRD and the EU Taxonomy disclosures (Article 8 of the Regulation (EU) 2020/852).

As part of its Scenario Analysis a climate resilience assessment was also conducted which measures the Group's ability to respond to the risks identified through its Scenario Analysis.

Approach

The Group has conducted its Scenario Analysis to assess the potential impact in 2030 and 2050 based on the IEA Net Zero Emissions ("NZE") Scenario and on a high emission scenario based on the IPCC RCP 8.5 scenario. The NZE is aligned with limiting the increase in temperature to 1.5°C, whereby temperatures peak by 2050 before declining. In the high emission scenario, temperatures are "as likely as not" to exceed 4°C by 2100. Climate risk assessments for European aviation developed by Eurocontrol and the International Civil Aviation Organization ("ICAO") were also considered. The scenarios are supported by assumptions around energy markets and commodity pricing, policy choices, GDP and population growth.

In both of these scenarios, focal questions were discussed across internal stakeholders to the potential climate related impact and associated effect on business strategy. These focal questions centred around carbon and fuel pricing, potential and future new technologies, demand for aviation travel, regulation and chronic risks that impact on aviation.

The Scenario Analysis examined impacts across the Group's operational boundary, which included upstream supply chain factors and downstream customer effects, across short, medium and long-term horizons. This analysis helped the Group identify short, medium and long-term climate-related physical and transition risks. These risks are an inherent part of operating in the airline industry with their impact being assessed through the ERM. Upstream climate risks are also raised with the Sustainability Committee. The potential quantitative financial impact is assessed using forecasting scenario analysis. All risks including those related to climate change are identified through the ERM. The register highlights the risks, their likelihood of occurring and impact with associated risk mitigation. The analysis on physical risks primarily focused on Group operations in Europe. The Group considered a regional assessment of climate risks for European aviation developed by Eurocontrol and were also informed by ICAO guidance on key climate change vulnerabilities for aircraft operators.

It highlighted several critical transition and physical risks that may impact the Group's operations, as well as identified opportunities and resilience of the organisation to the uncertainties. These risks and opportunities were enhanced through the IRO's identified as part of the DMA and was incorporated into that assessment.

Transition Risks

The Group considered transition risks (Table 2 below) and related these to its operations and network.

Under both scenarios, the Group may face increased fuel costs, driven by higher CO₂ pricing and SAF costs. From a technology perspective, it is assumed that under each scenario, aviation engine manufacturers continue to make improvements which deliver fuel efficiencies as has been seen historically. Airlines demand for these will continue regardless of the climate scenario as a way to reduce ongoing operational fuel cost.

In the NZE scenario, carbon pricing increases significantly compared to current levels. In the IPCC RPC 8.5 scenario, the Group may also face lower demand due to a poorer economic outlook. In this scenario, extreme weather events may occur resulting in operational disruptions.

Under both scenarios, the Group's operations are flexible and resilient, and it continues investing in the latest aircraft and engine technology.

Table 2 – Transition Risks

Transition Event	Risk Description	Business Activities Impacted	Time Horizon
Inability to meet mandated Sustainable Aviation Fuel (“SAF”) blending	Currently SAF availability represents a small percentage of the aviation industry’s needs. The cost of SAF, depending on the feedstock and country of uplift, can be up to four times the cost of normal jet kerosene. There is a risk through prohibitive pricing or lack of availability that the Group cannot meet mandated SAF blending requirements.	Increased costs for SAF or potential non-compliance penalties resulting in lower earnings. As part of the EU Emission Trading System (“ETS”) reform for aviation, SAF ETS allowances will be rewarded where SAF is uplifted. By having a strong relationship with leading SAF producers, the Group can reduce its ETS exposure.	Medium term Long term
Inability to access financing	The EU Taxonomy is classifying what sustainable activities are, with the aim of directing finance towards them. The EU Taxonomy has a narrower definition of OpEx KPI relative to the Group’s definition of OpEx and as such does not capture all sustainable expenditure (e.g., SAF spend). Therefore, the sector may find it difficult to attract funding for investments.	Potential for higher financial costs or inability to fund major CapEx effectively.	Medium term Long term
A reduction in asset valuations	The resale valuation of the Group’s fleet decreases due to fuel efficiency expectations.	Reduction in asset valuations/accelerated depreciation resulting in lower earnings.	Medium term Long term
Costs to transition to lower emissions technology	The Group has set the goal of reaching net zero emissions by 2050. The pathway to reaching net zero requires certain enhancements in new technologies which will reduce emissions. There is a risk that the cost of this new technology may be prohibitive.	Higher CapEx spend and lower earnings.	Long term
Increased consumer concern	Public concern about climate change may lead to reputational risks to the Group. If the Group is not perceived (regardless of whether it is) to be addressing climate change customers may choose to book with other airlines/other forms of transport that are perceived to be more proactive. These risks are identified by the Sustainability Team and Marketing Department by monitoring consumer opinion to climate change.	Reluctance to fly results in lower revenue.	Medium term Long term
Increased carbon pricing and aviation taxes	There is a risk that the increased cost of compliance with EU environmental regulation including carbon pricing and aviation taxes will make travelling by air in the EU expensive.	Increased operating costs and lower passenger revenues.	Medium term Long term
A ban on short haul travel	There is a risk that legislation is passed in certain jurisdictions that places a ban on sectors below a certain distance.	Potential loss of revenue on short haul.	Medium term

These are the transition risks that were considered as part of the climate scenario analysis. Those risks that were determined to be material for the Group for the purposes of sustainability reporting are disclosed on page 22.

Time-horizons

- Short-term risks: In this time frame, the Group produces an annual budget (approved by the Board) where it reviews its planned schedule of flying for the next 12 months.
- Medium term risks represent a longer time frame in which the regulatory environment evolves, the competitive landscape changes and customer preferences have the potential to shift. All of which impact on the business plan and operations (1 – 5 years).
- Longer term risks are those that potentially impact on the Group's competitiveness through demographic and economic shifts and advancements in engine and airframe technology. Consideration is given to both the average age of the fleet (approximately 10 years) and the useful life (approximately 23 years) of aircraft in setting this time horizon (greater than 5 years).

Physical Risks

The Group considered the following physical risks (see Tables 3 & 4) and performed its analysis to identify specific hazards in accordance with the relevant climate risk studies and related that to its operations and network. These physical risks primarily relate to changing weather patterns that if they occur with little forewarning may have a considerable impact on the Group's day-to-day operations in the short-term.

Table 3 – Physical Risks Considered

Chronic	Temperature-related	Wind-related	Water-related	Solid mass-related
	Changing temperature (air, freshwater, marine water)	Changing wind patterns	Changing precipitation patterns and types (rain, hail, snow/ice)	Coastal erosion
	Heat Stress		Precipitation or hydrological variability	Solid degradation
	Temperature Variability		Ocean acidification	Soil erosion
	Permafrost thawing		Saline intrusion	Solifluction
			Sea level rise	
Acute	Temperature-related	Wind-related	Water-related	Solid mass-related
	Heat wave	Cyclones, hurricanes, typhoon	Drought	Avalanche
	Cold wave/frost	Storms (including blizzards, dust and sandstorms)	Heavy precipitation (rain, hail, snow/ice)	Landslide
	Wildfire	Tornado	Flood (coastal, fluvial, pluvial, ground water)	Subsidence
			Glacial lake outburst	

Table 4 – Physical Risks

Physical Risk Event	Risk Description	Business Activities Impacted	Time Horizon
Rising temperature and sea levels	Chronic physical risks such as higher average temperature could potentially lead to lower load factors due to performance restrictions. As some of the airports the Group operate to are on coastal areas, a rise in sea levels due to higher temperatures could make the risk of flooding higher. If these airports closed due to flooding, it may result in the Group cancelling flights/closing bases and as a consequence change public willingness to travel to these locations.	Lower revenue as a result of cancelled flights.	Long term
Increased severity of extreme weather events such as wild-fires, cyclones and floods	The occurrence of extreme weather events and the resulting cancellations due to the closure of airports could also have a material adverse effect on the Group's financial performance indirectly, as a consequence of changes in the public's willingness to travel within Europe due to the risk of flight disruptions. Local impacts such as fires/drought impact on the attractiveness of the Group network.	Operational disruption and potential revenue loss. Costs of delays and operational disruption including turbulence.	Long term

Result of the Scenario Analysis

Following the Scenario Analysis, transition risks were identified as having the biggest potential impact on the Group's operations. However, while the transition and physical risks posed by climate change are significant, the Group is well positioned to address and mitigate them and adapt as necessary. By leveraging opportunities for innovation, collaboration, and sustainable growth, and by maintaining a resilient business model, the Group is well-positioned to continue navigating these challenges and ensure long-term sustainability.

The result of the Scenario Analysis shows that in the high emission scenario, the Group would face increased fuel costs and lower demand due to a poorer economic outlook. Also, extreme weather events are more likely to occur resulting in operational disruptions.

Our strategy

For more information on the Group's strategy, business model and value chain, please refer to the "Information on the Company" section on page 184 of the Annual Report.

For detail on employee headcount by key geographical areas, please refer to the "Characteristics of the undertaking's employees" section of the Sustainability Statement, page 59.



Sustainability related goals

The Group supports the Paris Agreement, the UN Sustainable Development Goals and the aviation industry's Destination 2050 through:

1. Investment in new aircraft technology;
2. Procurement of SAF – Working with suppliers to increase SAF with an industry-leading SAF goal of 12.5% by 2030;
3. Decarbonising ground operations; and
4. Support Government Policy & Reform – Work with policy makers to develop smarter regulation to support ambitious climate targets.

Sustainability strategy

Environment

The Group strives to be an ESG leader and to achieve its long-term target of net zero emissions by 2050. During FY25, Ryanair took delivery of 30 new Boeing 737-8200 “Gamechangers” (4% more seats, 16% less fuel & CO₂). The Group accelerated the retro-fit of scimitar winglets to the Boeing 737-800NG fleet (target 409 by 2026), reducing fuel burn by 1.5% and lowering noise emissions by a further 6%. From January 2025, the Group procured a 2% SAF blend at EU and UK airports.

During FY25, Ryanair retained its industry leading ESG ratings from MSCI (A), CDP (A-) and Sustainalytics (No.1 global large cap airline).

Ryanair is committed to ensuring that the Group's operations align with global efforts to mitigate the impact of climate change. To facilitate this, the Group developed a comprehensive Climate Transition Plan that outlines the Group's approach to reducing carbon emissions through fleet renewal and new technologies, promoting the scaling and use of SAF, and prioritizing action on climate change across our business. For the full Climate Transition Plan, please refer to page 24. In FY25, SBTi formally validated that the Group's near-term emission reduction target conforms with the SBTi Aviation pathway and is classified in line with a 1.5°C trajectory.

In FY25, Ryanair extended its partnership with TCDs Sustainable Aviation Research Centre (“the Centre”) for a further five years to 2030 (an additional €2.5m commitment). While the research will continue to focus on SAF and zero carbon aircraft propulsion systems, the scope of the Centre has been expanded to examine aviation non-CO₂ emissions.

Social

Operational Safety & Security

Safety & security of our passengers and people remain Ryanair's top priority. As part of this unwavering commitment, the Group continues to invest in, and develop, its Safety Management System (“SMS”) to ensure it is robust and facilitates the Group's goal of continuous improvement. This SMS provides a platform for end-to-end management of our safety and operational processes and includes processes for effective documentation, information gathering and audit.

In December 2024, Ryanair launched a new Safety Strategy (2025-2029). Key focus areas of the strategy include:

- Continue to manage the safe growth of Ryanair Group Airlines;
- Make the necessary arrangements for the safe introduction of the Boeing 737 MAX-10 into our operations; and
- Ensure new EU Cyber Security Regulations are successfully integrated into our management systems.

Read more about how safety is Ryanair's number 1 priority on page 53.

Customer

The Group's strategy is to deliver the best customer service performance in our peer group. The Group delivers industry leading punctuality and cancelled significantly fewer flights this year (well below 1%) compared to peers. During FY25, excluding ATC disruptions, approximately 87% of the Group's flights arrived at their destination on time. The Group has an ongoing commitment to improving customer satisfaction across the customer journey and this is measured by regular post-flight Customer Satisfaction ("CSAT") surveys and online "mystery passenger" checks. The Group's FY25 CSAT score was 86% (FY24: 85%), despite record ATC delays and cancellation, especially during peak summer months, due to ATC staff shortages, poor rostering and equipment failures.

Business model and value chain

The Group operates a low fares/low-cost, short-haul airline group and plans to develop this activity by expanding its successful business model on new and existing routes.

Our broad technology foundation, customer-centric business model, and recognised integrated solutions capability are core to the achievement of our vision. Our business model fundamentally depends on inputs across our business, including key intangible resources such as brand reputation, employee expertise, intellectual property and technology innovation. Guided by our vision, these key intangible resources drive our engagements with our customers and our stakeholders. By leveraging these, we continue to embed sustainability into all aspects of our business, driving sustainable practice.

Inputs

The Group's primary inputs include aircraft, fuel and human resources. The Group sources its aircraft predominantly from Boeing, focusing on the Boeing 737 model, which is known for its fuel efficiency and cost-effectiveness. This strategic choice helps the Group maintain low operational costs. Additionally, the Group utilises a fuel hedging strategy to mitigate against price volatility, ensuring stable and predictable fuel costs. The Group also invests in training and development programs to maintain a skilled workforce.

Benefits

For details on benefits for customers, investors, and other stakeholders, please refer to Table 5 – "Interests and views of key stakeholders and how they relate to the Group's business model".



Interests and views of stakeholders

The table below summarizes how the Group engages with different stakeholders.

Table 5 – Interests and views of key stakeholders and how they relate to the Group's business model

Stakeholders	Engagement occurrence per stakeholder	How engagement is organised	Purpose of the engagement	Outcome of engagement
Workforce	<p>Eamonn Brennan is the NED with oversight of workforce engagement.</p> <p>The role of the Workforce Engagement NED is to engage with the workforce and bring feedback to the Board so, together, the Board can understand and consider these views in its decision making.</p>	<p>The Board includes Workforce Engagement as an agenda item at least quarterly.</p> <p>During the past year, Eamonn Brennan, as Workforce Engagement NED, built upon previous panel engagements and hosted several panel discussions with various teams including cabin crew, engineers, ground ops, Labs team, office support staff and pilots.</p>	<p>The role of the Workforce Engagement NED is to engage with our workforce and bring feedback to the Board so together, the Board can understand and consider these views in its decision making.</p>	<p>Suggestions made at various panel discussions have subsequently been incorporated by the Group, including improvements to operational planning, staff travel and staff benefits. The "ESRS S1 – Own workforce" section further details the Group's own workforce interaction with the business model.</p> <p>Eamonn Brennan reported to the Board on workforce engagement at least quarterly during FY25.</p> <p><u>Expected benefits for Workforce</u> The Group offers secure and safe employment while promoting an inclusive working environment.</p>
Shareholders	<p>The Group recognizes the importance of communications with shareholders.</p> <p>The Group communicates with its shareholders following the release of quarterly and annual results and as part of the AGM.</p>	<p>Via roadshows, investor capital markets, and sustainability days, conferences, corporate governance & ESG forums and/or by investor and analyst conference calls.</p> <p>During FY25, the Group held discussions with a substantial number of institutional investors, analysts, ESG advisors (incl. CDP, ISS-Governance, MSCI and Sustainalytics) and proxy advisor firms (incl. Glass Lewis, ISS and PIRC). Additionally, Ryanair carried out a review of its ownership and control restrictions, including extensive engagement with shareholders between September 2024 and March 2025.</p> <p>Additionally, NEDs including the Chairman, SID, Committee Chairs and Workforce Engagement NED (as appropriate) met shareholders at the Company's Shareholder Corporate Governance & ESG forums and AGM.</p>	<p>These successful events provide an opportunity for shareholders to directly engage with Board members and Senior Management on a range of different ESG topics.</p>	<p>The Board is kept informed of the views of shareholders through the Executive Director and Senior Management (including the Group CFO, Chief Sustainability Officer and Head of Investor Relations).</p> <p>Furthermore, feedback from roadshow meetings and airline analyst reports are provided to the Board on a regular basis.</p> <p><u>Expected benefits for Shareholders</u> The Group prioritises growth opportunities to drive shareholder value while maintaining a strong balance sheet.</p>

Stakeholders	Engagement occurrence per stakeholder	How engagement is organised	Purpose of the engagement	Outcome of engagement
Customers	<p>Every customer who flies with Ryanair is invited to rate their trip based on a number of criteria. This rating forms the basis of the CSAT survey.</p> <p>From time to time, there may be additional requirements to engage with customers to gauge their views or get their feedback and to support these efforts, the Group commits to ad-hoc surveys and focus groups approximately twice every quarter.</p>	Each year the Group recruits customers to take part in our Customer Panel. The Customer Panel is made up of customer representatives from across the Group's key markets.	<p>Provide feedback on new initiatives aimed at improving our Customer experience.</p> <p>The Customer provides valuable feedback and insights to enable the Group to improve its customer offerings.</p>	<p>Notable impacts from engagement were:</p> <p>Feedback from the Customer Panel led to enhancements to Ryanair's Day of Travel Assistant App. From a CSAT perspective, the Group's management of delays saw improvement, driven by better and more timely customer communications during disruptions through our App.</p> <p>Efforts across the inflight experience such as improved lighting, new on board customer announcements and commitment to aircraft appearance and overall ambience, resulted in a significant improvement in the customer experience.</p> <p>New airport wayfinding and navigation branding alongside new pre-flight communications through our Day of Travel Assistant App contributed to an uplift in satisfaction with our Boarding experience.</p> <p>Updates to our contact centre, including interactive voice response and a reduction in centre wait times made a considerable, positive, impact on our customer's interaction with our Customer Service team.</p> <p><u>Expected benefits for Customers</u> The Group provides customers with safe, affordable, reliable and accessible flights.</p>
Suppliers/ Contractors	On an ongoing basis - when services are rendered, or supplies provided.	<p>The Group engages suppliers formally through new contract initiation or contract renewal.</p> <p>On an ongoing basis, suppliers' performance is monitored and managed by various teams across the Group.</p> <p>Engagement takes place in relation to operational performance.</p>	Ensure suppliers are providing the best service and quality to the Group through engagement and feedback.	<p>Outcomes of engagement are assessed continuously by the Group through the ongoing provision of services.</p> <p><u>Expected benefits for Suppliers/Contractors</u> The Group ensures supportive long term working relationships with suppliers through collaboration and timely and accurate payments.</p>

Governance

For information on the Board and Management teams' composition and governance structure, including sustainability matters, please refer to page 17 of the Annual Report.

Sustainability Governance

1. Management of IROs

Board & Audit Committee

The Board of Ryanair is responsible for the leadership, strategic direction and oversight of management of the Group. The Board's primary focus is on strategy formulation, policy and control. It has a formal schedule of matters specifically reserved to it for its attention, including matters such as approval of the annual budget, large capital expenditure, and key strategic decisions. Other matters reserved to the Board include treasury policy and procedures, internal control, audit and risk management, ESG, remuneration of the Executive Director and Senior Management and corporate governance.

Semi-annually, the Audit Committee assesses and reports to the Board on the ERM which lists the key risks facing the Group including those related to ESG. The Audit Committee is also responsible for reviewing the Group's arrangements for its employees to raise concerns, in confidence, about possible wrongdoing in financial reporting or other matters and ensuring that these arrangements allow proportionate and independent investigation of such matters and appropriate follow up action and business conduct.

The Board has ultimate oversight and responsibility for the Group's climate transition plan, strategy in achieving sustainability goals and climate related risks and opportunities. The Board and Audit Committee receive frequent updates on Group's climate related risks and performance from the Chief Sustainability Officer and Group CFO.

The Group CEO is a member of the Board. The Group CEO has responsibility for all issues including sustainability related issues as this role oversees the strategy, objectives, opportunities and long-term planning of the Group. For more information see Table 6 – "Material IRO's addressed by the administrative, management and supervisory bodies, or relevant committees during the reporting period" on page 20.

Eamonn Brennan is the Group's NED with oversight of workforce engagement. The role of the Workforce Engagement NED is to engage with our workforce and bring feedback to the Board so together, the Board can understand and consider these views in its decision making. The Board includes Workforce Engagement as an agenda item at least quarterly.



Skills

The Board self-assess skills set against key requirements. The Board have knowledge and understanding of the Impacts, Risks and Opportunities identified through the DMA. For information on how the Group reviews Board member's knowledge against nine different competencies, including sustainability and business conduct matters please refer to page 19 of the Annual Report.

Sustainability Committee

The Sustainability Committee is an Executive/Management level committee that meets monthly and is chaired by the Chief Sustainability Officer. It is responsible for the day-to-day identification, assessment and management of climate-related risks impacts and opportunities. It is also responsible for ensuring implementation of relevant policies. The Sustainability Committee covers all Group airlines within the Group and includes members from multiple areas across the organisations including Operations, Engineering, Labs, Finance and Sustainability. Together, Committee members integrate the Group's sustainability goals with the business and regulatory demands. These initiatives are then rolled out to the wider Group. The Sustainability Committee maintains an effective and continual dialogue with the Board and stakeholders (via the Chief Sustainability Officer and the Group CFO). Long, medium and short-term risks and opportunities are addressed on an ongoing basis by the Sustainability Committee and Sustainability Team who ultimately report to the Audit Committee and Board.

Sustainability Team

The Sustainability Team is responsible for the day-to-day management and delivery of the Group's sustainability strategy and targets. The team reports to the Group CFO with a dotted line to the Board and Audit Committee. The Sustainability Team are members of the Sustainability Committee and provide weekly and monthly emission intensity analyses to executives and senior management. The team is also responsible for procuring SAF blends in line with the targets set by the Board and executive management. The Sustainability Team ensure compliance with carbon trading schemes, most notably, the EU & UK ETS and CORSIA. Monitoring of emission savings of new projects implemented by the Sustainability Committee is performed by the Sustainability Team with regular updates provided to the Sustainability and Audit Committees.

Gender, Diversity & Inclusion Committee

The Gender, Diversity & Inclusion Committee promotes and supports diversity initiatives within the Group. The Committee is chaired by the Ryanair DAC CFO. The Committee introduced measures to promote and encourage diversity, equality and inclusion including an updated gender inclusive uniform policy, International Women's Day initiatives and Pride celebrations. Updates from the Gender, Diversity & Inclusion Committee are brought to the executive management team's attention with updates provided to the Board, as appropriate.

Group Safety and Security Committee

The Group Safety & Security Committee reviews and discusses air safety and security performance. The Committee reports to the Board at least quarterly. Members include Mike O'Brien (Co-Chair), Ryanair's Chief Risk Officer, Carol Sharkey (Co-Chair) and Eamonn Brennan. Accountable Managers (and various other nominated persons) of each of the Ryanair Group Airlines are invited to attend meetings.



**'ONE
MISSION'**
SAFETY

2. IROs addressed by the Board and Management Teams

Table 6 includes a list of the material IROs addressed by management and the relevant committees:

Table 6 – Material IRO's addressed by the administrative, management and supervisory bodies, or relevant committees during the reporting period

IROs addressed by Board and management teams	Management teams	Frequency
E1-IRO1; E1-IRO2; E1-IRO3; E1-IRO4; E1-IRO5; E1-IRO6; E1-IRO7; E1-IRO8; E1-IRO9; E1-IRO10; E1-IRO11; E1-IRO12; E1-IRO13; E1-IRO14	Board of Directors	Quarterly
E2-IRO15	Audit Committee	At least 4 times per year
E5-IRO16	Sustainability Committee	Weekly and Monthly
	Sustainability Team	Daily
S1-IRO17; S1-IRO 18; S1-IRO19; S1-IRO20; S1-IRO21; S1-IRO22; S1-IRO23; S1-IRO 24; S1-IRO25; S1-IRO26	Board of Directors	Quarterly
	Audit Committee	At least 4 times a year
	Nomination Committee	At least 4 times a year
	Gender, Diversity & Inclusion Committee	Quarterly
	Safety and Security Committee	Quarterly
S4-IRO27; S4-IRO28; S4-IRO29; S4-IRO30; S4-IRO31	Board of Directors	Quarterly
	Audit Committee	At least 4 times a year
	Safety & Security Committee	Quarterly
G1-IRO32; G1-IRO33; G1-IRO34; G1- IRO35	Board of Directors	Quarterly
	Audit Committee	At least 4 times per year

These IROs are considered as part of broader strategy and decision-making considerations.

For more information, please refer to each ESRS section in this statement.

3. Sustainability-related performance in incentive schemes

For information on the remuneration policies, please refer to page 144 of the “Report of the Remuneration Committee” included in the Annual Report.

4. Statement on sustainability due diligence

Table 7 maps to where in the Sustainability Statement the Group provides information about their due diligence process.

Table 7 – Overview of due diligence processes as outlined in the Sustainability Statement

Core elements of due diligence	Sections in the Sustainability Statement	Page
Embedding due diligence in governance, strategy and business model	Our strategy	14
	Governance	18
Engaging with affected stakeholders in all key steps of the due diligence	Interests and views of stakeholders	16
	Governance	18
Identifying and assessing adverse impacts	Double Materiality Assessment Methodology	4
	Climate Change	22
	Pollution	46
	Consumers and end users	64
Taking actions to address those adverse impacts	Actions and resources in relation to climate change policies	33
	Actions and resources related to pollution	46
	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	68
	Taking action on material impacts on consumers and end-users, and approaches to managing material risks related to consumers and end-users, and effectiveness of those activities	69
Tracking the effectiveness of these efforts and communicating	Climate Change	36
	Pollution	46
	Consumers and end users	72

5. Risk management over sustainability reporting

For information on the Group's risk management and internal controls, please refer to the "Risk Management & Internal Control" section, page 21.

The ERM assesses risks based on a matrix of the likelihood of occurrence and potential financial or operational impact to the Group. Sustainability related risks are integrated into the ERM. The Group deems substantive financial risks as those that would result in a major or catastrophic impact on business operations and are assessed to have a probable likelihood of occurring. The results of the ERM are reviewed by both the Audit Committee and the Board. Resolution of these matters typically requires Board approval.

For information on the main risks identified and related mitigation strategies, please refer to the "Impact, Risk and Opportunity management" section in each section. Key risks (including those identified through the DMA/IRO process), are assessed as part of a semi-annual review of the ERM.

ESRS E1 – CLIMATE CHANGE

Table 8 – Climate Change IROs

Climate Change Adaptation				
E1-IR01	Risk	Upstream	Long-term	The potential risk of not being able to adopt new, low carbon technologies due to reasons outside of the Group's control (e.g., availability). (Transition Risk)
E1-IR02	Positive Impact	Own Operations	Long-term	The positive impact of offering customers in markets where the Group operates the opportunity to reduce their carbon footprint by providing flights that are less GHG intensive compared to competitors.
E1-IR03	Risk	Own Operations	Medium-term	The possible risk of increased operating costs due to extreme weather events and other climate related physical impacts. (Physical Risk).
E1-IR04	Risk	Own Operations	Long-term	The possibility of increased operating costs due to the expansion of the EU ETS, the Carbon Offsetting and Reduction Scheme for International Aviation ("CORSIA") and other fuel related penalties. (Transition Risk)
E1-IR05	Risk	Own Operations	Long-term	The potential reduction in market share due to The Group's perceived lack of climate adaptation measures. (Transition Risk)
E1-IR06	Opportunity	Own Operations	Short-term	The Group's assets are highly mobile so not as exposed to negative climate conditions as compared to other industries, meaning it can adapt to climate change events quickly.
Climate Change Mitigation				
E1-IR07	Positive Impact	Upstream	Short-term	The Group's suppliers making environmentally friendly decisions due to encouragement from the Group.
E1-IR08	Positive Impact	Own Operations	Short-term	The positive impact on the environment of the Group investing in fuel efficient/lower emitting aircraft and procuring SAF.
E1-IR09	Positive Impact	Downstream	Medium/Long-term	The positive impact of helping to reduce the aviation industry's impact on the environment by providing financial support and access to data to sustainable aviation researchers.
E1-IR010	Negative Impact	Own Operations	Medium-term	The actual negative climate impact of GHG emissions released from flights operated by the Group.
E1-IR011	Risk	Upstream	Short-term	The possibility of increased operating costs due to the Group's inability to meet mandated SAF blending requirements due to issues outside the Group's control (e.g., availability). (Transition Risk)
E1-IR012	Risk	Own Operations	Short-term	The potential reduction in market share due to the Group's perceived role in climate change. (Transition Risk)
Energy				
E1-IR013	Negative Impact	Own Operations	Short-term	The Group's energy consumption has a negative impact on the environment.
E1-IR014	Risk	Own Operations	Short-term	The Group is exposed to potential price fluctuations which in turn may increase operating costs. (Transition Risk)

Strategy

The Board has ultimate oversight and responsibility over the Group's climate transition plan, strategy in achieving sustainability goals and climate-related risks impacts and opportunities (see Table 8 above). The Board and Audit Committee receive regular updates on the Group's climate related risks and performance from the Chief Sustainability Officer and Group CFO.

These risks, opportunities and impacts are identified through scenario analyses, horizon scanning and ongoing industry scrutiny. Key transitional risks are assessed and managed across the organization primarily through the ERM with upstream climate risks also raised to the Sustainability Committee. These risks include Market and Technology Shifts, Reputation, Policy, Legal and Physical Risks.

The Group's strategy to manage its impact on the environment is laid out in its "Pathway to Net Zero", a detailed plan in which it aims to achieve its emissions reductions. This pathway forms a key pillar of the ongoing Group strategy that will impact the business in the coming years. IROs are addressed on an ongoing basis by the Sustainability Committee and Sustainability Team who ultimately report to the Audit Committee and Board.

The Group recognises that transition risk costs will arise. The Group has a strong history in maintaining a young, fuel-efficient fleet. Any breakthrough in new technology engines will be procured as part of ongoing fleet renewal and is not expected to be outside the normal course of fleet renewal. Additionally, while SAFs currently trade at a premium of 3x - 4x compared to the cost of normal jet kerosene, the long-term outlook is for price convergence. There are a number of policies under review which reduce the existing price divergence (e.g., as part of the Emission Trading System reforms, airlines will be awarded free ETS allowances where SAF has been uplifted). Any, and all, firm commitments regarding climate change transition are recognised within respective going concern or impairment assessments.

As part of the identification of climate related risks and opportunities, a climate scenario analysis was conducted. Key focal questions were asked under each scenario to assess potential climate impacts on strategy.

Financial statements

For more information on the Group's CapEx spend please refer to Note 2 of the consolidated financial statements. There is no significant, out of course spend, associated with implementing actions to grow opportunities or mitigate material risks or negative impacts. For information on the Group's resilience analysis please refer to the "Climate Scenario Analysis" section on page 9.

The Group's transition plan for climate change mitigation

The Group developed a pathway to net-zero emissions by 2050 that aligns to the Paris Agreement (as described per the aviation industry's feasibility study – "Destination 2050" with steps to achieving set out below). The Group's pathway shows that decarbonisation and alignment with EU and International climate targets are possible.

The Group is not excluded from the EU Paris aligned benchmarks.

The Group's commitment to reducing GHG emissions and holding the increase in the global average temperature to 1.5°C above pre-industrial levels (per the Group's 2031 emission intensity target), in line with the Paris Climate Agreement (Climate Change Mitigation) was found to be material in the Group's DMA.

The Group has taken proactive measures to reduce its fuel burn and in turn reduce its impact on the environment.

The transition plan is made up of four pillars:

- i. Technological and operational improvements combining contributions from propulsion technologies as well as wing, fuselage and tail technologies, is predicted to help reduce 32% of carbon emissions.
- ii. SAF is expected to deliver approx. 34% of carbon emission reduction.
- iii. Independent studies have shown that the introduction of the Single European Sky initiative will reduce emissions by up to 10%.
- iv. Based on currently available projections, 24% of the Group's Net Zero commitment will be supported by offsetting and other economic measures. While the Group recognises that carbon offsetting is not a long-term solution, either financially or for the environment, much of the Group's climate ambition is dependent on a number of factors, many of them outside its control. Therefore, the Group may have to continue offsetting beyond 2050, however this would be a last resort. This requirement to offset is largely in line with the sectors feasibility study – Destination 2050.

Investments and funding

The Group makes a number of investments and funding to support the implementation of the Climate Transition Plan. This plan identifies two key areas to decarbonize, specifically, fleet renewal and the increased use of SAF. These elements are embedded within the Group's financial plans. For further detail on investments, please refer to Table 13 on page 33.



CONSOLIDATED DISCLOSURES PURSUANT TO ARTICLE 8 TAXONOMY REGULATION

Background

The EU Taxonomy is a classification system for environmentally sustainable economic activities, the purpose of which is to direct investments towards sustainable projects and activities and to provide companies, investors and policymakers with appropriate definitions for which economic activities can be considered environmentally sustainable.

Article 8 of Regulation (EU) 2020/852 (the “Taxonomy Regulation”) establishes a framework to facilitate sustainable investing. As part of the Taxonomy Regulation, Ryanair is required to disclose how and to what extent the Group’s activities are associated with economic activities that qualify as environmentally sustainable under Articles 3 and 9 of the Taxonomy Regulation and Article 10(4) and Article 10(6) of Commission Delegated Regulation (EU) 2021/2178 as amended by Commission Delegated Regulation (EU) 2023/2486.

The six environmental objectives of the Taxonomy Regulation are:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

Taxonomy Eligible and Taxonomy Alignment

Business activities are taxonomy-eligible if they can be allocated to an economic activity described in the Climate or Environmental Delegated Acts.

A taxonomy-aligned activity is one that having identified eligibility

1. Contributes substantially to at least one of the six environmental objectives above;
2. Does no significant harm (“DNSH”) to the other environmental objectives; and
3. Complies with the minimum safeguards.

Details on substantial contribution, do no significant harm and minimum safeguards are given below.

Scope

The EU Taxonomy Regulation’s reporting scope covers the Group’s business activities, based on the same principles of consolidation as the consolidated financial statements, adjusted for the various narrower scope definitions of the EU Taxonomy Regulation. The activity relevant to the Ryanair Group, is activity 6.19 “Passenger and freight air transport” under the environmental objective, climate change mitigation. This economic activity covers all owned and leased aircraft that the Group operates for the transport of passengers.

For FY24 the Group was required to report eligible revenues, operating expenditures and capital expenditures for this activity, with aligned revenues, operating expenditures and capital expenditures in scope for reporting in FY25. The Group has not completed templates 1 to 5 within Delegated Regulation (EU) 2022/1214, as following review, the activities listed are not applicable.

Substantial contribution

The EU Taxonomy Regulation provides detailed substantial contribution criteria to ensure that the associated economic activity has either a substantial positive impact on one of the six aforementioned environmental objectives or substantially reduces the negative impact on the environment. The most relevant objective for the Group is Climate Change Mitigation.

Do no significant harm

Together with the criteria to assess if an activity substantially contributes to at least one of the EU Taxonomy Regulations environmental objectives, the criteria for DNSH specify the minimum requirements that the economic activity should meet to avoid harming any of the other five environmental objectives. The DNSH criteria differ by economic activity and by environmental objective. Any breach of the DNSH criteria would automatically disqualify an activity from being environmentally sustainable and as such lead to the associated activities not meeting the criteria for alignment.

Minimum safeguards

The EU Taxonomy Regulation defines the minimum safeguards as due diligence and remedy procedures implemented by a company that is carrying out an economic activity in order to ensure alignment with the Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises ("OECD MNEs") and the UN Guiding Principles on Business and Human Rights ("UNGPs"). The latter includes the principles and rights set out in eight of the ten fundamental conventions identified in the International Labor Organization ("ILO") Declaration of the Fundamental Principles and Rights at Work and the International Bill of Human Rights.

EU Taxonomy Definitions of Key Performance Indicators

The EU Taxonomy Regulation requires the reporting of KPIs associated with Turnover, CapEx and OpEx, both for eligible and aligned activities. Each KPI is calculated as the amount associated with aligned and non-aligned economic activities (the numerator) divided by the total (denominator). As only one economic activity is relevant to the Ryanair Group, double counting in the allocation in the numerator of turnover, CapEx, and OpEx KPIs across economic activities is avoided. These KPIs are defined below for the purposes of EU taxonomy reporting.

The reporting basis of the EU Taxonomy Regulation differs to the Group's consolidated financial statements, which are prepared in accordance with International Financial Reporting Standards as adopted by the EU ("IFRS"). These differences include a very narrow scope definition for OpEx which results in a significantly lower reported eligible OpEx under the EU Taxonomy Regulation when compared to Total Operating Expenses as reported under IFRS. Prior year comparatives within the Taxonomy tables were not subject to sustainability assurance.

While the Group is supportive of efforts to enhance and increase the comparability of climate disclosures, the limited scope of the EU Taxonomy Regulation does not enable the Group to outline all of its investment activity in its Pathway to Net Zero transition. The limitations of the Regulation specifically prevent the Group from fully disclosing its purchase of SAF. The additional reporting restrictions on aviation (where the growth of the entire global aviation fleet is used to discount an individual company's investment in best in-class aircraft and SAF) also limit the Group's ability to fully express its financial commitment to the transition to a low carbon environment. This approach, requiring company-specific performance to be adjusted based on global trends, is unique to the aviation sector and, we believe, dilutes the impact of the Taxonomy in driving more investment at an individual company level.

Turnover

Consists of Total Operating Revenues. See consolidated income statement per page 266 of the Annual Report alongside Note 16 for details of the Group's revenue generation. The associated accounting policies are set out on pages 270 to 281 of the Annual Report.

	FY25 €m	FY24 €m
Scheduled Revenues	9,230	9,145
Ancillary Revenues	4,719	4,299
Total taxonomy turnover (denominator)	13,949	13,444

The numerator for the Turnover KPI is Total Operating Revenues. The following table provides a summary of taxonomy-eligible and taxonomy-aligned turnover by major economic activity, both as absolute figures (being the numerator) and as a percentage of the denominator:

	FY25 Eligible		FY25 Aligned	
	€m	% of denominator	€m	% of denominator
Passenger and freight air transport	13,949	100%	-	0%
Total taxonomy-eligible/aligned turnover	13,949	100%	-	0%

Ryanair has assessed compliance towards minimum safeguards and DNSH criteria and concluded that for FY25, it did not meet all the criteria set by the Taxonomy. Therefore, Ryanair did not proceed to determine its Taxonomy-aligned Turnover for FY25.

CapEx

CapEx consists of additions to fixed assets, right of use assets and intangible assets. See Notes 2, 3 and 4 to the consolidated financial statements.

	FY25 €m	FY24 €m
Additions to property, plant and equipment	1,228	2,159
Additions to right of use assets	23	23
Additions to intangible assets	-	-
Total taxonomy CapEx (denominator)	1,251	2,182

The numerator for the CapEx KPI is aircraft additions, which have decreased when compared to the prior year due to repeated Boeing delivery delays. The following table provides a summary of taxonomy-eligible and taxonomy-aligned CapEx by major economic activity, both as absolute figures (being the numerator) and as a percentage of the denominator:

	FY25 Eligible		FY25 Aligned	
	€m	% of denominator	€m	% of denominator
Passenger and freight air transport	1,175	94%	-	0%
Total taxonomy-eligible/aligned CapEx	1,175	94%	-	0%

Ryanair has assessed compliance towards minimum safeguards and DNSH criteria and concluded that for FY25, it did not meet all the criteria set by the Taxonomy. Therefore, Ryanair did not proceed to determine its Taxonomy-aligned CapEx for FY25.

OpEx

The OpEx KPI is defined as those costs not capitalised that relate to: (i) research and development; (ii) building renovation measures; (iii) short-term leases; (iv) maintenance and repair; and (v) other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment. The Group has no significant short-term leases.

As noted above, the OpEx KPI definition is narrower than the Group's definition of operating expenditure and does not capture all of the expenditure on otherwise sustainable spend (e.g. sustainable aviation fuel usage per 6.19 technical screening criteria). The Group considers that the definitions of the OpEx KPI, when considering the Turnover KPI, does not reflect the economic reality of operating a taxonomy-aligned asset. For instance, all Turnover associated with the operation of a taxonomy-aligned aircraft meet the definition of the Turnover KPI, however, the costs associated with operating that aircraft are limited to the above.

The OpEx KPI is reconciled to Total Operating Expenditure per the consolidated income statement as follows:

	FY25 €m	FY24 €m
Maintenance, materials and repairs	476	415
Total taxonomy OpEx (denominator)	476	415
Other operating expenses outside the scope of EU Taxonomy Regulation	11,915	10,968
Total Operating Expenses	12,391	11,383

The numerator for the OpEx KPI is maintenance, material and repairs as noted in the consolidated income statement on page 266 of the Annual Report. The following table provides a summary of taxonomy-eligible and taxonomy-aligned OpEx by major economic activity, both as absolute figures (being the numerator) and as a percentage of the denominator:

	FY25 Eligible		FY25 Aligned	
	€m	% of denominator	€m	% of denominator
Passenger and freight air transport	476	100%	-	0%
Total taxonomy-eligible/aligned OpEx	476	100%	-	0%

Ryanair has assessed compliance towards minimum safeguards and DNSH criteria and concluded that for FY25, it did not meet all the criteria set by the Taxonomy. Therefore, Ryanair did not proceed to determine its Taxonomy-aligned OpEx for FY25.

Table 9 – Turnover - proportion of turnover from products or services associated with taxonomy-aligned economic activities – FY25

Financial Year N	FY25			Sustainable contribution criteria						DNSH criteria ("Does Not Significantly Harm")							Proportion of Taxonomy-aligned (A.1) or eligible (A.2) Turnover, FY24	Category (enabling activity)	Category (transitional activity)
	Code	Turnover	Currency €m	%	Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Y/N	Y/N	Y/N
A. Taxonomy – Eligible Activities																			
A1. Environmentally sustainable activities (Taxonomy-aligned)																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	0%		
Of which enabling		0	0%	0%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	0%	E	
Of which transitional		0	0%	0%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	0%		T
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Passenger and freight air transport	6.19	13,949	100%	100%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	100%		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		13,949	100%	100%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%		
A. Turnover of Taxonomy-eligible activities (A.1+A.2)		13,949	100%	100%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%		
B. Taxonomy – Non-Eligible Activities																			
Turnover of taxonomy non-eligible activities		0	0%	0%															
Total (A + B)		13,949	100%	100%															

Table 10 – CapEx - proportion of capex from products or services associated with taxonomy-aligned economic activities – FY25

Financial Year N	FY25			Sustainable contribution criteria						DNSH criteria ("Does Not Significantly Harm")							Minimum safeguards	Proportion of Taxonomy-aligned (A.1) or eligible (A.2) CapEx, FY24	Category (enabling activity)	Category (transitional activity)
	Code	CapEx	Proportion of CapEx FY25	Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Y/N	Y/N	%	E	T
A. Taxonomy – Eligible Activities																				
A1. Environmentally sustainable activities (Taxonomy-aligned)																				
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%														0%		
Of which enabling		0	0%	0%														0%	E	
Of which transitional		0	0%	0%														0%		T
A2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
Passenger and freight air transport	6.19	1,175	94%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									95%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		1,175	94%	94%	0%	0%	0%	0%	0%									95%		
A. CapEx of Taxonomy-eligible activities (A.1+A.2)		1,175	94%	94%	0%	0%	0%	0%	0%									95%		
B. Taxonomy – Non-Eligible Activities																				
CapEx of taxonomy non-eligible activities		76	6%																	
Total (A + B)		1,251	100%																	

Table 11 – OpEx - proportion of OpEx from products or services associated with taxonomy-aligned economic activities – FY25

Financial Year N	FY25			Sustainable contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Minimum safeguards	Proportion of Taxonomy aligned (A.1) or -eligible (A.2) OpEx, FY24	Category (enabling activity)	Category (transitional activity)
	Code	OpEx	Currency € million	%	Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	%	E	T
A. Taxonomy – Eligible Activities																			
A1. Environmentally sustainable activities (Taxonomy-aligned)																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0	0%	0%												0%		
Of which enabling		0	0	0%	0%												0%	E	
Of which transitional		0	0	0%	0%												0%		T
A2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Passenger and freight air transport	6.19	476	100%	100%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							100%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		476	100%	100%	100%	0%	0%	0%	0%	0%							100%		
A. OpEx of Taxonomy-eligible activities (A.1+A.2)		476	100%	100%	100%	0%	0%	0%	0%	0%							100%		
B. Taxonomy – Non-Eligible Activities																			
OpEx of taxonomy non-eligible activities		0	0%	0%															
Total (A + B)		476	100%	100%															

1. Impact, risk, and opportunity management

Table 12 – Policies related to environmental topics: climate change mitigation and adaptation, energy, pollution and circular economy/resource use.

Policy	IRO nr	Topics addressed	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability
Group's Environmental Policy (2024)	E1-IR01 E1-IR02 E1-IR03 E1-IR04 E1-IR05 E1-IR06 E1-IR07 E1-IR08 E1-IR09 E1-IR10 E1-IR11 E1-IR12 E1-IR13 E1-IR14 E2-IR15 E5-IR16	<p>The key topics this Policy addresses have been influenced by the Group's DMA and focuses on the IROs identified as part of the DMA, namely:</p> <ul style="list-style-type: none"> Climate Change Adaptation Climate Change Mitigation Energy Pollution of Air Resources Inflows (focused on resource scarcity as it relates to jet fuel) 	<p>The Group's Environmental Policy (2024) outlines its strategy to manage environmental IROs and achieve emission reductions through its 'Pathway to Net Zero'.</p> <p>The Pathway is made up of four pillars:</p> <ol style="list-style-type: none"> Technological and Operational Improvements. SAF. Single European Sky Initiative. Carbon offsetting and other economic measures. 	All Group entities, airline operators, locations, and offices.	<ul style="list-style-type: none"> Board of Directors Audit Committee Sustainability Committee Sustainability Team 	<ul style="list-style-type: none"> European Commission's MRV for aviation non-CO₂ emissions European Union's and UK's ETS CORSIA EU Taxonomy disclosures TCFD CDP 	Publicly & Internally

Note: External and internal stakeholders' views were considered when drafting this Policy and such views were shared as part of the Group's DMA. Insights were also gathered through other stakeholder forums, including the Group's Corporate Governance Forum, trade association engagement and other forms of stakeholder engagement. For more information on the involvement of management in the policy, please refer to the "Sustainability Governance" section.

Actions and resources in relation to climate change policies

Table 13 – Actions and resources for the reporting year

IRO nr	Value chain	Decarbonisation levers	Action(s) reporting year	Resource Allocated
E1-IRO1 E1-IRO2 E1-IRO3 E1-IRO4 E1-IRO5 E1-IRO6 E1-IRO8 E1-IRO9 E1-IRO10 E1-IRO11 E1-IRO12 E1-IRO13 E1-IRO14 E2-IRO15 E5-IRO16	Own Operations	Sustainable Transportation	<ol style="list-style-type: none"> To date, the Group has retrofitted over 50% of the Boeing 737-800NG fleet with split scimitar winglets. This technology improves fuel efficiency by approx. 1.5%, reduces noise by over 6% and decreases NOX emissions by 8%. (E1-IRO1, E1-IRO4, E1-IRO13, E1-IRO14, E2-IRO15, E5-IRO16) The Group previously (including during FY25) offered customers the option to offset carbon emissions from their flight. (E1-IRO2) The Group took delivery of 30 Boeing 737-8200 "Gamechanger" aircraft in the year. This increases the fleet size to 176 at year end. These aircraft carry 4% more passengers but burn 16% less fuel, reduce emissions by 16% and are up to 50% quieter. (E1-IRO4, E1-IRO8, E1-IRO10, E2-IRO15) The Group took steps to improve the Landing Take Off ("LTO") cycle efficiency, including operating 80% of flights on Single Engine Taxi In ("SETI") and using Continuous Decent Approach ("CDA") on 78% of flights. (E1-IRO4, E1-IRO5, E1-IRO8, E2-IRO15) The Group agreed deals for a 2% SAF blend at EU and UK airports. (E1-IRO4, E1-IRO8, E1-IRO10, E1-IRO11, E1-IRO12, E2-IRO15, E5-IRO16) The Group has extended its partnership and support for the Sustainable Aviation Research Centre at TCD for a further 5 years, until to 2030 (E1-IRO12, E1-IRO9) The Group continues to use dynamic flight plans to respond rapidly to avoid potential weather events. (E1-IRO3, E1-IRO6) 	<ol style="list-style-type: none"> The Group invested in 30 new, more fuel-efficient Boeing 737-8200 "Gamechanger" aircraft. (E1-IRO9, E1-IRO10, E1-IRO13, E1-IRO14, E5-IRO16) The Group is procuring a 2% SAF blend on fuel uplifts at EU and UK airports since January 2025. (E1-IRO8, E1-IRO13, E2-IRO15, E5-IRO16) Since 2021, the Group has made a €1.5m donation to fund the Group's Sustainable Aviation Research Centre at TCD. (E1-IRO12, E1-IRO9)
E1-IRO7 E1-IRO12	Upstream/ Downstream	Sustainable Transportation	<ol style="list-style-type: none"> The Group initiated an EU-wide petition calling on the EU to protect overflights in the event of ATC strike action with over 2 million signatures, submitted to the EU Commission. (E1-IRO7, E1-IRO12) 	
E1-IRO7 E5-IRO16	Upstream/ Downstream	Supply Chain Engagement	<ol style="list-style-type: none"> The Group continues to encourage ground handlers to increase their electric equipment usage across airport locations. (E1-IRO7, E5-IRO16) 	
E1-IRO2 E1-IRO10 E2-IRO15	Upstream/ Downstream	Customer Concern	<ol style="list-style-type: none"> With a fuel efficiency of 64 grams of CO₂ per passenger/ kilometre ("pax/km"), the Group is a leader in the industry for fuel efficiency. (E1-IRO2, E1-IRO10, E2-IRO15) 	

Table 14 – Actions and resources for the future

IRO nr	Value chain	Decarbonisation levers	Future Action(s)	Resource Allocated
E1-IRO1 E1-IRO2 E1-IRO4 E1-IRO5 E1-IRO6 E1-IRO8 E1-IRO9 E1-IRO10 E1-IRO11 E1-IRO12 E2-IRO15 E5-IRO16	Own Operations	Sustainable Transportation	<p>1. The Group has bi-lateral agreements in place with a number of SAF suppliers such as Shell, OMV, ENI, and Repsol. These agreements allow the Group to access SAF at key airport locations and will help the Group meet its target of 12.5% SAF usage by 2030. By using SAF, GHG and non-GHG emissions will decrease which will reduce ETS and CORSIA compliance costs. (E1-IRO4, E1-IRO8, E1-IRO10, E1-IRO11, E2-IRO15, E5-IRO16)</p> <p>2. The Group has extended its partnership and support for the Sustainable Aviation Research Centre at TCD for a further 5 years, to 2030 (E1-IRO12, E1-IRO9, E2-IRO15). The scope of the Centre has been expanded to examine aviation non-CO₂ emissions, with an aim of understanding and developing predictive tools for contrail formation and the development of an internationally recognised methodology that supports the predictions of Nitrogen Oxide ("NOx"), Sulphur Oxides ("SOx") and soot particles.</p> <p>3. The Group will continue to invest in new technologies to be more fuel efficient and deliver ongoing operational cost savings. (E1-IRO1, E1-IRO2, E1-IRO4, E1-IRO5, E2-IRO15, E1-IRO12, E5-IRO16)</p> <p>4. The Group has committed to renewing its fleet with up to 300 new Boeing 737 MAX-10s in the fleet by the end of FY34 while retiring older aircraft. (E1-IRO1)</p> <p>5. The Group continues to be one of the most fuel-efficient major EU airlines. The change in legislation to remove EU ETS allowances in 2024 is less impactful on the Group than on other less efficient airlines. This presents a competitive advantage whereby the cost gap between the Group and competitors operating on similar routes widens. The Group has the lowest cost per passenger of any major European airline, giving it a significant competitive advantage. This, coupled with its leadership in carbon reduction, ensures that the Group's fares will typically be the lowest in the market, a key competitive advantage over higher cost airlines. (E1- IRO4, E1-IRO5, E1-IRO6, E5-IRO16)</p>	<p>1. The Group has committed to invest in new, more fuel-efficient aircraft. (E1-IRO9, E1-IRO10, E5-IRO16).</p> <p>2. The Group will make a further €2.5m donation (£4m total) to fund the Ryanair Sustainable Aviation Research Centre at TCD over the next 5 years. (E1-IRO12, E1-IRO9).</p>
E1-IRO7 E1-IRO13 E5-IRO16	Upstream/ Downstream	Supply Chain Engagement	<p>1. The Group will continue to be opportunistic and engages a wide range of fuel suppliers to manage developments by switching supply lines should constraints/disruptions arise. The Group continues to be the lowest cost operator which is a key competitive advantage over higher cost airlines/ forms of transport (E1- IRO7, E1-IRO13, E5-IRO16)</p>	

Note: For more information on the Group's CapEx spent implementing actions, please refer to Note 2 to the financial statements on page 282 of the Annual Report. There is no significant, out of course spend, associated with implementing actions to grow opportunities or mitigate material risks or negative impacts. Ryanair does not have any investments in coal, oil and gas-related economic activities. The Group's purchase of 30 Boeing 737-8200 "Gamechanger" aircraft in FY25 are considered taxonomy eligible. There has been no taxonomy alignment in the current fiscal year.

2. Metrics and Targets

Targets related to climate change mitigation and adaptation, pollution and resource use

The Group's emission intensity is targeted to reduce by 27% by 2031 in line with limiting the average global increase in temperatures to 1.5°C. The Group had this target validated by SBTi in FY25.

The Group's Environmental Policy (2024) commits the Group to what the Board and management believe are ambitious future environmental targets, building on impressive achievements to date, including commitments to address climate change, and the priorities and policies which will allow the Group to continue to lower CO₂ emission intensity. The Group's reduction targets are included in Table 15 below.

Stakeholders have been involved in target setting for each material sustainability matter through the views and inputs obtained through the DMA (page 4) and through the interests and view of stakeholders (page 16).

Table 15 – Targets set by the group to measure actions to address IROs

Material IRO's addressed	Target
E1-IRO1 E1-IRO3 E1-IRO5 E1-IRO8 E1-IRO10	Net Zero emissions by 2050 (from base year 2021)
E1-IRO2 E1-IRO4 E1-IRO5 E1-IRO6 E1-IRO9	48g CO ₂ pax/km by 2031 (c.27% reduction from base year 2023)
E1-IRO13 E1-IRO14	Scope 2 absolute emission reduction of 35% by 2030
E1-IRO7 E1-IRO13	Non-fuel scope 3 emissions reductions of 50% by 2030
E1-IRO8 E1-IRO9 E1-IRO10 E1-IRO11 E1-IRO12 E5-IRO16	Use a 12.5% SAF blend across flights by 2030.



Table 16 – The Group's GHG emission targets

Target Type	Target Detail	Target Base Year	Target Year	Pathway	Field	Target Objective	Indicator	Performance in FY25	Performance to date
Absolute (Scope 1 MtCO ₂ e)	Net Zero emissions by 2050 (from base year 2021)	2021	2050	Technological Improvements. 32% of carbon emission reduction targets came from technological and operational improvements.	Fleet Renewal	210 Boeing 737-8200s and up to 300 Boeing 737 MAX-10s in the fleet by FY34 while retiring older aircraft.	Number of latest generation aircraft in the fleet (Boeing 737-8200s and Boeing 737 MAX-10s)	30 Boeing 737-8200s introduced to fleet in FY25.	176 Boeing 737-8200s delivered to March 31, 2025.
						Fit scimitar winglets on 409 Boeing 737-800NG fleet by 2026 to save up to 1.5% fuel.	Number of Boeing 737-800NG retrofitted with Scimitar Winglets	c. 102 retrofit in the year	>50% of Boeing 737-800NG's retrofitted to date.
					LTO cycle efficiency	Continue to operate SETI at 100% of airports where taxi time permits. Use CDA on flights where air traffic management allows.	% of flights that operate SETI % of flights that use CDA	80% 78%	Operated 80% of flights on SETI Used CDA on 78% of Flights

Target Type	Target Detail	Target Base Year	Target Year	Pathway	Field	Target Objective	Indicator	Performance in FY25	Performance to date
				SAF	Use of alternative fuels (low carbon product)	<p>Power 12.5% of flights using SAF by 2030.</p> <p>Obtain sufficient SAF quantities in line with EU mandates post 2030.</p> <p>Help scale SAF production through the funding of research into feedstocks and certification.</p> <p>Support the Group Sustainable Aviation Research Centre at TCD in its research into sustainable aviation.</p>	% of SAF used	0.4%	<p>80% of 2030 goal secured.</p> <p>Uplifted SAF as part of mandates at EU and UK airports.</p> <p>Committed to supporting the Sustainable Aviation Research Centre at TCD for a further 5 years (to 2030).</p>
				Single European Sky Initiative	In-flight efficiency	<p>10% of reduction in emissions with the introduction of the Single European Sky initiative.</p> <p>Successfully lobby the European Commission and European countries to liberalise airspace to facilitate a Single European Sky.</p>	Introduction of the Single European Skies, resulting in a 10% reduction in emissions.	N/A	<p>EU wide petition, calling on the EU to protect overflights in the event of ATC strike action with over 2m signatures, submitted to EU Commission.</p>

Target Type	Target Detail	Target Base Year	Target Year	Pathway	Field	Target Objective	Indicator	Performance in FY25	Performance to date
				Carbon Removals	Removal Projects	24% of emission reduction target to occur with offsetting and other economic measures. Achieve net zero emissions by 2050 through progressive offsetting and removal projects.	% emissions offset	The Group offered customers the option to offset carbon emissions from their flight.	The Group is monitoring developments in relation to CORSIA and will procure projects to be retired in line with legislation.
Absolute (Scope 2 Market Based MtCO ₂ e)	Scope 2 absolute emission reduction of 35%	FY22 (Base Year emissions: 3,717 mt)	2030	Energy Efficiency	Renewable Energy	Reduce Scope 2 emissions by 35% by 2030.	# tonnes Scope 2 emissions % of green energy used	Certified Green electricity used in Dublin Buildings and in our hangars in Seville, Stansted, and Vienna.	The Group continues to use green electricity across different Group locations.
Absolute (Scope 3)	Scope 3 (non-fuel) absolute emission reduction of 50%	FY22 (Base Year emissions: 192,970 mt)	2030	Energy Efficiency	Vehicle Electrification	Non-Fuel scope 3 absolute emission reduction of 50% by 2030	# of e-turnarounds	In FY25, a new ground handling partnership with 'Skytanking Aviation' was agreed, who use electric equipment at certain locations.	Continued encouragement of ground handlers to increase electric equipment usage.

Note: Group's targets in relation to Resource Use are centred on increasing the Group's use of SAF. The Group will only procure SAF that complies with Annex IX of Renewable Energy Directive (RED II).

Table 17 – The Group's Emission Intensity

Emission intensity (Grams of CO ₂ e per PAX/km)	FY25
Scope 1	64.9
Scope 2	0.0
Scope 3 (category 3)	13.5

In aviation, emission intensity is measured by CO₂ per PAX/km. The above metrics includes conversion of other GHG emissions (methane and nitrous oxide) into CO₂. In FY25, the Group's Scope 1 CO₂ per PAX/km, excluding these other emissions was 64 grams.

SBTi Targets

In FY25, the Group's gCO₂ PAX/km target (48g CO₂ per PAX /km by 2031) was validated by the Science Based Targets initiative ("SBTi") – the preeminent corporate climate organisation that standardises the setting of GHG emission reduction targets and confirms alignment to a limiting of global average temperature increases to 1.5°C. Achieving this target will mean that the Group will have reduced its carbon intensity by c.27% from a 2023 baseline (66g CO₂ per PAX/km).

Group's contributions to achieve reduction targets

The Group's emission intensity is targeted to reduce by 27% by 2031. The reduction in emission intensity is driven through fleet renewal, improved operational efficiency and increased use of SAF.

The SBTi Aviation Pathway only covers Scope 1 Jet A1 Kerosene and Scope 3.3 Fuel related activities which covers 99% of the Group's emissions inventory. The Group's intensity target is set in line with SBTi guidance and excludes non-fuel emissions (Scope 1 Natural Gas, Scope 2 – electricity, all Scope 3 emissions categories apart from Scope 3 – cat 3 – Fuel and energy related activities).

SAF (50% of the 27% intensity reduction)

SAF avoids the generation of new carbon emissions from fossil fuels and minimises global warming. Rather than being refined from petroleum, SAF is produced from sustainable sources like waste oils (from biological origin), agricultural residues or non-fossil CO₂. SAF can reduce lifecycle GHG emissions by up to 80%. The Group has a public target that 12.5% of jet fuel use in 2030 is from SAF expecting to result in an effective reduction in carbon intensity of 13.5% compared to a 2023 baseline.

The EU wide ReFuel EU Aviation mandates require jet fuel suppliers to use a 20% SAF blend by 2035. As such, the Group expects, following discussions with our key fuel suppliers, that there will be sufficient excess SAF supply in the market as jet fuel producers scale up to this 20% mandate level.

SAF is produced using renewable feedstock, such as biomass, waste, or CO₂, instead of the fossil-based feedstock used for conventional petroleum jet fuels. Lifecycle GHG emissions, also known as the carbon intensity ("CI") of petroleum jet fuels, are estimated at 84.5 gCO₂e/MJ, of which 87% is combustion emissions. On the other hand, biomass derived SAFs have low CIs compared to petroleum jet fuels, primarily because carbon emissions from combustion of biomass and SAFs released during fuel production and fuel combustion are offset by carbon uptake during biomass growth.

Fleet Renewal (23% of the 27% intensity reduction)

The Group is renewing its fleet through the future delivery of the Boeing 737-8200 and Boeing 737 MAX-10 aircraft (collectively Boeing 737-MAX). These new aircraft deliver enhanced efficiency, improved environmental performance incorporating advanced technology winglets and efficient engines, reduce fuel use and emissions by up to 20% compared to the aircraft it replaces. The Group has a 210 order from Boeing for Boeing 737-8200 latest technology aircraft, with 176 received to the end of March 2025. Additionally, over the period from 2027 to 2033, the Group is contracted to receive up to 300 of the Boeing 737 MAX-10 aircraft.

Operational Measures (27% of the 27% intensity reduction)

Air Traffic Management ("ATM") Reform

Enhancement to ATM will reduce carbon and non-CO₂ emissions. A standard, more efficient, ATM process would result in a meaningful reduction in carbon emissions and bring us closer to our goal of net-zero carbon emissions by 2050. The Group has been a long-time advocate of the "Single European Sky". The European Aviation net zero feasibility study, "Destination 2050" identified the potential savings from ATM reform.

SBTi Progress

In FY25, the Group's CO₂ intensity reduced by 2ppts relative to the 2023 base year.

Energy Consumption and Mix

The Group's approach to energy usage is governed by the Group's Environmental Policy (2024). The Policy dictates the Group will only procure SAF that complies with Annex IX of Renewable Energy Directive ("RED II"). Through independent research, supported by the Group, SAF was found to have up to 80% less lifecycle emissions than kerosene jet fuel.

Regarding non-Jet Fuel energy, at the time of contract renewal, the Group engages with energy providers to procure certified renewable energy (preferably through Virtual Power Purchasing Agreements ("VPPAs")), where appropriate and economical, in the quantities needed to meet the Group's Scope 2 emissions goals. The Group's total energy consumption is represented in Table 18.

Table 18 – The Group's Energy Consumption Mix

Energy consumption and mix	FY25
1. Fuel consumption from coal and coal products (MWh)	-
2. Fuel consumption from crude oil and petroleum products (MWh)	67,056,005
3. Fuel consumption from natural gas (MWh)	9,383
4. Fuel consumption from other fossil sources (MWh)	1,796
5. Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	7,756
6. Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	67,074,940
7. Consumption from nuclear sources	-
Share of fossil sources in total energy consumption (%)	100%
8. Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	319,503
9. Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	3,267
10. The consumption of self-generated non-fuel renewable energy (MWh)	-
11. Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	322,770
Share of renewable sources in total energy consumption (%)	0%
Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)	67,397,710

The Group does not produce any energy on site but is a consumer of other energy producers.

Energy intensity based on net revenue

The Group's total energy consumption per net revenue is 4.8 KWh/€. Table 19 below includes net revenue by activities in high climate sector and taxonomy. Net revenue used as the denominator in the GHG emission intensity calculation is equal to total net revenue reported in the fiscal year 2025 Consolidated Financial Statements.

GHG Intensity based on net revenue.

While grams of CO₂ per revenue passenger km is the industry's preferred way to measure carbon intensity, as the Group operates in a high climate impact sector (aviation), it is required to disclose the GHG total emissions per net revenue. The Group does not believe this to be a fair (or appropriate) metric for the aviation industry as it rewards high cost, high fare airlines while punishing low cost, energy efficient airlines. In FY25, this was 1,441 MtCO₂e/€m (Location Based) and 1,441 MtCO₂e/€m (Market Based).

Table 19 – The Group's net revenue in relation to taxonomy revenue

	€'M
Net revenue from activities in high climate impact sectors used to calculate energy intensity	13,949
Taxonomy Net revenue	13,949
Total net revenue (Financial statements)	13,949

The Group has specified the "aviation sector" as part of determining the energy intensity disclosure required.

Gross Scopes 1, 2, 3 and total GHG emissions

The Group has prepared its GHG emissions statement for FY25, in accordance with the World Resources Institute and World Business Council for Sustainable Development's GHG Protocol standards and guidance (collectively, the GHG Protocol):

- Scope 1 emissions have been prepared in accordance with the GHG Protocol Corporate Accounting and Reporting Standard (revised edition).
- Scope 2 emissions have been prepared in accordance with the GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard.
- To the extent presented, Scope 3 emissions have been prepared in accordance with the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

The below table lists the Gross Carbon dioxide equivalent ("CO₂e") of the Group's operations. For detailed information on methodologies for each metric, please refer to the "Methodologies" section.

Table 20 – Carbon dioxide equivalent (CO₂e) of the Group's operations (in tonnes)

Scopes	Retrospective		Milestones and Target Years			
	Base Year	FY25	2025	2030	2050	Annual % target v. base year
Scope 1						
Total Scope 1 Emissions		16,536,228				
Percentage of Scope 1 GHG emissions from regulated ETS		89%				
Scope 2						
Market Based		2,834				
Location Based		2,824				
Total Scope 1 & 2 Emissions (Market)		16,539,062				
Total Scope 1 & 2 Emissions (Location)		16,539,052				
Scope 3						
Category 1: Purchased Goods & Services		1,687				
Category 2: Capital Goods		18,863				
Category 3: Fuel and energy related activities		3,443,268				
Category 4: Upstream Transportation and Distribution		13,011				
Category 5: Waste generated in operations		95				
Category 6: Business Travel		1,370				
Category 7: Employee Commuting		33,252				
Category 8: Upstream Leased Assets		4,095				
Category 9: Downstream transportation		N/A				
Category 10: Processing of Sold Products		N/A				
Category 11: Use of Sold Products		42,366				
Category 12: End of life treatment of sold products		N/A				
Category 13: Downstream leased assets		N/A				
Category 14: Franchises		N/A				
Category 15: Investments		N/A				
Total Scope 3 Emission		3,558,006				
Total						
Total emissions (Market Based)		20,097,067				
Total emissions (Location Based)		20,097,058				
Biogenic CO ₂ (Scope 1)		7,782				

There were no biogenic emissions in Scope 2 or Scope 3.

The Group has not set a 2030 Scope 1 absolute target, rather, the Group is focused on achieving the SBTi aligned emission intensity target for 2031.

Table 21 below provides a full breakdown of what GHG emissions are included in the assessment of Scope 1 and 2 emissions.

Table 21 – List of GHG emissions included in the assessment of Scope 1 and 2 emissions (in tCO₂e).

Greenhouse Gases	Scope 1	Scope 2 (location based)	Scope 2 (market based)	%
Carbon dioxide (CO ₂)	16,386,934	2,795	2,805	99%
Methane (CH ₄)	11,421	12	12	0%
Nitrous oxide (N ₂ O)	137,873	17	17	1%
Hydrofluorocarbons (HFCs)	-	-	-	-
Perfluorocarbons (PFC)	-	-	-	-
Sulphur hexafluoride (SF ₆)	-	-	-	-
Nitrogen trifluoride (NF ₃)	-	-	-	-

Note: The Group is reporting on consolidated basis.

GHG removals and GHG mitigation projects financed through carbon credits

The Group's Approach to Offsetting and Other Economic Measures

On current projections, to achieve its Net Zero target, approximately 24% of the Group's emissions in 2050 will be offset. While the Group recognise that offsetting is not a long-term solution, either financially or environmentally, much of the Group's climate ambition is dependent on a number of factors, many of them outside its control. Therefore, the Group may have to continue offsetting beyond 2050. This will be done as a last resort. For more information on net-zero and reduction targets please refer to the "Targets related to climate change mitigation and adaptation" section.

The Group does not rely on carbon offsetting to achieve its SBTi verified targets.

In FY25, the Group did not develop its own carbon offsetting projects or contribute to any offsetting projects in its upstream or downstream value chain.

EU & UK Emissions Trading Schemes

Intra-European flights are required to adhere to the EU and UK ETS whereby emissions on these flights are subject to the Cap-and-Trade scheme. c.89% of the Group's flights are in scope for ETS and the remainder is subject to the CORSIA.

CORSIA

The flights not covered by an ETS scheme (c.11% in FY25) largely fall under the CORSIA.

The flights under the scope of CORSIA are required to offset any growth in CO₂ emissions above a 2019 baseline (85% of 2019 levels). The Group is not required to offset under CORSIA until 2027 and SAF can be used to reduce airline offsetting requirements, through the use of CORSIA Eligible Fuels.

Offsetting projects

In prior years (including during FY25), the Group offered its customers the opportunity to offset emissions through its Customer Offset Scheme. Projects supported by the Group directly and with contributions from the offsetting scheme include the methane capture and electricity production in Bulgaria, the Kartaldagi wind power plant project in Turkey and distribution of cookstoves in Nepal (all Gold Standard projects).

Additionally, the Group supports reforestation in Portugal – through the sponsoring of the Monchique project which follows the Conservation Standard accreditation.

To maintain the Gold standard accreditations, each project must demonstrate additionality (i.e., the project would not have occurred without the incentive provided by carbon credit revenues) and prove carbon leakage (i.e., the increase in GHG emissions in one country as a result of an emissions reduction by a second country with stricter climate change mitigation policies) does not occur. Each project is required to provide an assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period. Credits for the above projects are purchased retrospectively and are cancelled upon purchase.

Table 22 – GHG removals

Removals	FY25	Methodologies
GHG Removal activity 1 (ex. Forest restoration)	0	
Total GHG removals from own operations (tCO ₂ eq)	0	
GHG Removal activity 2 (ex. Direct air capture)	0	
Total GHG removals in the upstream and downstream value chain (tCO ₂ eq)	9,437	Label Bas-Carbone méthode Boisement

Carbon credits

Carbon credits planned to be cancelled in the future and cancelled this reporting year are disclosed in the tables below (Table 23 and Table 24):

Table 23 – Carbon credits planned to be cancelled in the future

Carbon credits planned to be cancelled in the future	Amount until (period)
Total (tCO ₂ eq)	40,728

Table 24 – Carbon credits cancelled in the reporting year (FY25)

Carbon credits cancelled in the reporting year	FY25
Total (tCO ₂ eq)	296,559
Share from removal projects (%)	3%
Share from reduction projects (%)	97%
Gold standard (%)	97%
Label Bas-Carbone méthode Boisement (%)	3%
Reversals	0
Share from projects within the EU (%)	47%
Share of carbon credits that qualify as corresponding adjustments (%)	0%

Internal carbon pricing

As part of the Group's forecasting and budgetary processes, carbon pricing is a key consideration in determining the merits of new fuel efficiency (Scope 1 emission reduction) projects. Recent examples where internal carbon pricing was applied include:

- fleet renewal/purchasing;
- the use of new technology software to reduce fuel burn;
- the retrofit of the Boeing 737-800NG fleet with split scimitar winglets; and
- the uplift of SAF.

As c.89% of flights are in scope for an ETS scheme, the ETS price is the most applicable carbon price and is the price used internally as part of decision making. This price traded in a range of c.€60 – €85 per CO₂ tonne in FY25.

The Group applies a singular uniform carbon price as part of the decision-making process across all group airlines and regardless of decision type.

Price determination

Intra-European flights are required to adhere to the ETS whereby emissions on these flights are subject to the Cap and trade scheme. As c.89% of the Group flights are in scope for ETS, the ETS price is the most effective carbon price and is the price used internally as part of decision making. The Group expects pricing to change in line with changes in the EU ETS and UK ETS pricing schemes. Additionally, should the Group's exposures change to such an extent that ETS is not the dominant carbon pricing mechanism (e.g., CORSIA pricing becomes more prevalent), the Group will evolve its pricing approach.

The internal Group price of carbon will change in line with changes in the market pricing of ETS.

100% of Scope 1 and Scope 3 (category 3) emissions are covered by the Group's internal carbon pricing scheme.

Table 25 – Price determination metrics

Types of internal carbon prices	Volume at stake (tCO ₂ eq)	Prices applied (€/tCO ₂ eq)	Methodology/ Perimeter description
CapEx shadow price	18,863	€60 - €85	Volume reflects emissions associated with new aircraft purchases
Internal carbon fee or fund	19,978,881	€60 - €85	Volume reflects emissions from aircraft (Scope 1 and Scope 3 – Category 3)

ESRS E2 – POLLUTION

1. Impact, risk, and opportunity management

Table 26 – E2 – Pollution

Pollution of air				
E2-IR015	Negative Impact	Own Operations	Short-term	Ryanair have a negative impact on the environment due to air pollution from non-GHG emissions (e.g., nitrous oxides)

The Group does not have a key dependency on communities within its operations as per the output of the DMA. Further research is required to better understand the impact on communities from non-GHG emissions.

Policies related to pollution

The Group Environmental Policy (2024) sets out the guidelines the Group will strive towards to achieve our Pathway to Net Zero. One of the key topics this Policy addresses have been identified through the Group's DMA and focuses on the IROs identified as part of the DMA, namely:

- Pollution of Air

For detailed information on the Group Environmental Policy (2024), please refer to Table 12 on page 32.

Actions and resources related to pollution

For detailed information on pollution-related actions, please refer to Table 13, "Actions and resources for the reporting year" on page 33. The areas outlined in this table primary relate to actions to reduce fuel consumption which in turn can result in lower air pollutants being released.

From January 2025, the Group is required to take part in the EU's MRV of non-CO₂ effects. The Group will monitor and submit data to the relevant competent authorities annually in this regard. When further research has been performed, and the exact role that aviation's non-GHG emissions have in climate change is established, an action plan will be developed to address the issue. However, most steps will be out of the control of the Group.

2. Metrics and targets

Targets related to pollution.

The Group has not set any specific non-GHG reduction targets. The Group will track the effectiveness of the policy measures undertaken by monitoring policy outcomes from the European Commission in relation to pricing of non-GHG emissions.

Air pollutants

The main environmental contributions from non-GHG emissions in aviation come from the formation of persistent contrails and particularly the resulting aviation-induced clouds, as well as from the chemical atmospheric reactions driven by NO_x emissions. While the scientific understanding of the climate impact of NO_x has evolved over the last decade, the confidence level on the magnitude of the impact remains low. Flying also produces other various non-GHG effects, including sulphur dioxide ("SO₂"), water vapour, soot and aerosols.

The pollutants listed in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council deemed as relevant are:

- Carbon monoxide ("CO");
- Nitrogen oxides ("NO_x");
- Sulphur oxides ("SO_x")/ SO₂;
- Particulate matter ("PM₁₀"); and
- Non-methane volatile organic compounds ("NMVOCs") (including Benzene, Ethylbenzene, Toluene, Xylene).

Even though NMVOCs are produced as part of the exhaust of emissions of aircraft engines, as cited by the European Environment Agency (“EEA”) (2023) it is recognized that very few experiments have analysed the exhaust gas from aircraft turbines in detail. As these pollutants are not included in the EEA’s calculator methodology, as well as acknowledging aforementioned challenges related to measurement of NMVOCs, and relatively smaller share of these pollutants (in comparison to other such as CO₂), calculation of the associated emissions for these species was not included.

Table 27 – Air pollutants specific loads

	Amount (mt)
Carbon monoxide	16,989
Nitrogen oxides	77,366
Sulphur oxides	4,391
Particulate matter	549



Methodologies and assumptions

Flight emissions are dependent on a number of factors, including times in mode, fuel flow rates, and emission indices in these different modes. Current practices rely on estimation of aircraft emissions in the LTO cycle using the ICAO Engine Exhaust Emissions Databank (which assumes constant values of thrust settings, times in mode, fuel flow rates and emission indices for the different phases of the LTO cycle) and the EEA’s calculator, which factors in these assumptions for the calculation.

In the estimation of air pollutants, master emission calculator (Annex 1) to EEA’s Guidebook (2023) was used. The calculator estimates the fuel consumption and the corresponding emissions for a large number of aircraft types for different stage lengths and with an LTO cycle based on ICAO and European average time assumed. The methodology factors in aircraft specific LTO emission factors and average emission factors for the climb, cruise, and decent phase, which are embedded in the calculation model. This calculation is not validated by an external body. The use of representative emission factors may contribute to ‘uncertainty’. It is difficult to calculate a quantitative uncertainty estimate.

Note: The Group identified no material risks or opportunities in its DMA related to pollution.

ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY

1. Impact, risk, and opportunity management

Table 28 – Resource Inflows including Resource Use and Circular Economy related IROs

Resource Inflows including Resource Use				
E5-IRO16	Risk	Own Operations	Medium-term	It is possible the Group's activities may be disrupted due to resource scarcity, specifically in relation to jet fuel.

Policies related to resource use and circular economy

The Group's Environmental Policy (2024) ("Policy") sets out the guidelines the Group will strive towards to achieve our environmental goals including the efficient use of resources. The key topics this Policy addresses have been influenced by Group's DMA and focuses on the IROs identified as part of the DMA, namely:

- Resources inflows (focused on resource scarcity as it relates to jet fuel).

The Policy notes the Group's use of newer more fuel-efficient technologies which reduce the Group's requirements on conventional (fossil) aviation fuels. Additionally, the Policy notes the Group's plans to increase SAF usage. For detailed information on the Group's Environmental Policy (2024), please refer to Table 12 on page 32.

Actions and resources related to resource use and circular economy

Jet fuel is subject to wide price fluctuations because of many economic and political factors and events occurring throughout the world that the Group can neither control nor accurately predict. The events include increases in demand, sudden disruptions in supply and other concerns about global supply, as well as market speculation.

The Group has a strong relationship with multiple jet fuel suppliers and conducts an annual tender with each of its jet fuel suppliers. As part of the tender process, the security of supply is assessed.

The Group has a strategy for increased fuel efficiency (in line with SBTi target), as well as increased deployment of SAF. SAF is defined as renewable or waste-derived aviation fuels that meets sustainability criteria. They can be made from, depending on the pathway and feedstocks, renewable biomass, and waste resources. The Group's objective is to only procure SAF that complies with Annex IX of RED II.

For more information on resource use related actions, please refer to Table 13, "Actions and resources in relation to climate change policies", page 33.

2. Metrics and targets

Targets related to resource use and circular economy

For detail on how the Group set up its resource use targets, please refer to Table 15 on page 35.

These targets focus on the minimisation of primary raw material and sustainable sourcing (i.e. improving fuel efficiency and reducing reliance on conventional aviation jet fuel). The targets do not focus on increasing circular product design, or material use rate or waste management (no waste hierarchy applicable).

Resource inflows

Resource inflows are the raw materials used by a company and it was found to be material as part of the DMA. The Group's most material resource inflow is jet fuel. The total consumption of jet fuel is outlined in the table below.

The Group will also continue to increase its use of SAF. From January 2025, the ReFuel EU and UK SAF blending mandates (2% blend) became applicable. Research has shown that SAF can reduce the mass and number of soot particles emitted, which in turn could potentially decrease the lifetime of contrail cirrus clouds. SAFs typically have a lower aromatics content than conventional jet fuel and could also provide benefits related to local air quality at airports.



Table 29 includes information related to products sustainably sourced, reused or recycled.

Table 29 – Products sustainably sourced, reused or recycled

	Tonnes ('000's)
Total weight of products	5,227
% Sustainably Sourced	0%
Weight of secondary products	25
% of secondary products	0%

Methodologies and assumptions

The Group determines jet fuel usage based on a combination of on-board measurement equipment and invoices from jet fuel suppliers.

ESRS S1 – OWN WORKFORCE

1. Impact, risk, and opportunity management

Table 30 – Own Workforce IROs

Working Conditions				
S1-IR017	Positive Impact	Own Operations	Long-term	The Group's prioritisation of the safety and security of our people through a comprehensive and robust safety management system and extensive & safety training.
S1-IR018	Risk	Own Operations	Short-term	The possibility of occupational accidents occurring if the Group's health and safety standards are not adhered to.
S1-IR019	Risk	Own Operations	Short-term	The potential increase in operational costs if the Group and our unions do not cooperate on issues that lead to strikes and other disruptions.
S1-IR020	Opportunity	Own Operations	Short-term	Collective bargaining allows us to manage workforce related issues (most notably in respect of flight crew who represent the biggest proportion of our people) in a timely manner and fosters positive employee and employee representative relationships. Efficiencies realised from this could drive positive financial opportunities for the business, and help to reduce costs associated with litigation action, and/or employee attrition.
S1-IR021	Positive Impact	Own Operations	Short-term	The Group delivers a positive impact to employees through the provision of secure employment. Whilst complying with relevant regulations, secure employment also benefits employees by promoting well-being, increasing productivity, improved job satisfaction and drives career development.
S1-IR022	Positive Impact	Own Operations	Medium-term	The Group provides for a positive work-life balance, through the implementation of the Group's various workforce-related policies including annual leave and flexible working.
Equal treatment and opportunities for all				
S1-IR023	Positive Impact	Own Operations	Medium-term	The Group promotes an inclusive working environment including having a Gender, Diversity & Inclusion Committee that helps promote and supports diversity initiatives throughout the Group.
S1-IR024	Positive Impact	Own Operations	Medium-term	The Group creates an inclusive and fair working environment by enforcing its Non-Discrimination Policy (2025).
S1-IR025	Positive Impact	Own Operations	Medium-term	The Group offers excellent training and promotional opportunities to help upskill our people and assist with their career development. This includes training of cadets, pilots, cabin crew and engineers.
S1-IR026	Opportunity	Own Operations	Medium-term	The Group can increase its productivity and ensure continued high quality through its training and development programme.

Material IROs and their interaction with the Group's strategy and business model

The Board developed an action plan to address areas for improvement, including forward planning and retention of an adequate skillset mix within the Board and its Committees while enhancing Board diversity during a period of refreshment with several long-serving NEDs retiring in FY25 and FY26. The Group's Human Resources ("HR") team are responsible for day-to-day workforce management. It is responsible for recruitment, training, rostering, industrial relations, internal communications and the diversity, equality, and inclusion agenda.

The Group's Scenario Analysis or DMA have not identified any negative impacts on its own workforce that result from the Group's work towards its ambitious environmental goals. All positive impacts related to the Group's own workforce occur in the Group's own operations. The Group's material risks and opportunities concerning collective bargaining, are associated with the flight crew segment of the workforce. Labor relations could expose the Group to risk. In December 2017, the Group announced its decision to recognize trade unions for collective bargaining purposes. Since then, most Group airlines have concluded Collective Labor Agreements ("CLAs") with trade unions in key markets. The CLAs concluded to date vary by country but include agreements on recognition, seniority, base transfers, promotions, pay and rostering arrangements. There may be a push for legacy type working conditions which, if acceded to, could decrease the productivity of crew, increase costs and have an adverse effect on profitability.

Ryanair Group airlines and their union partners have negotiated multiple CLA's since 2017. Initial agreements were reached in 2018 -2019 following the decision to recognize trade unions for collective bargaining. During the Covid crisis the Company negotiated emergency job protection agreements with unions for temporary pay cuts to avoid job losses. Pay under these emergency agreements was due to be restored from 2022 to 2025, however Ryanair concluded agreements with the majority of unions in 2022 which accelerated pay restoration with pay fully restored by December 2022. Since then the Company has reached long term agreements with pilots and cabin crew in most major markets that set pay rates and protect the Company's people productivity model. CLA's are in place covering employed pilots and cabin crew in all major markets with agreements typically lasting 3 to 5 years. No agreements expired in FY25. Whilst these agreements set pay and conditions for the coming years, high inflation in the general economy, a global recession and a shift in market conditions could lead to unrealistic expectations by trade unions and excessive pay demands that could lead to labor unrest.

The Group's employees include aircrew, engineering, ground operations and office staff. For more information on the Group's types of employees and non-employees in the workforce, please refer to page 59.

All people in our workforce who could be materially impacted (positively or negatively) by the Group's activities and its direct or indirect business relationships are included in the scope of the ESRS 2 disclosures. This understanding has been developed through ongoing workforce engagement as outlined below. None of the Group's own workforce are particularly vulnerable to impacts or are marginalised, and all employees are contractually based in jurisdictions which are not vulnerable to significant risks of incidents of forced labor or compulsory labor (as defined by its prevalence in the Global Slavery Index).

Stakeholder Engagement

The Group engages with its stakeholders to incorporate their interests into our policy frameworks. For more information on our stakeholder engagement please see the "Value chain and stakeholder analysis" section on page 6.

Table 31 – Policies related to Own Workforce

Policy	IRO	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability
Group's Safety Strategy (2025-2029)	S1-IR017 S1-IR018 S1-IR021	<p>The Group have identified 5 Focus Areas and 14 Strategic Safety Goals which take account of</p> <ul style="list-style-type: none"> Management of Change Key Operational Risk Areas ("KORAs") SMS Continuous Improvement Aviation Security Group Operations 	All Group employees and non-employees in the workforce, including aircrew, engineering, ground operations and office staff	<ul style="list-style-type: none"> The Group's Safety Committee Group's Chief Risk Officer Accountable Managers of each of the Group's Airlines 	<ul style="list-style-type: none"> EASA Part 145 and UK CAA Aviation Authority, (including the IAA, TMCAD Malta, the Polish CAA and the UK CAA) Category IIIA landings (automatic landings with minimum horizontal visibility of 200 meters and a 50 feet decision height) 	Internally Publicly
Group's Freedom of Association Policy (2025)	S1-IR019 S1-IR020	The Group's Freedom of Association Policy (2025) governs its approach to Labor Relations. It sets out the Company's commitment to promoting an open and inclusive workplace. It also sets out the Company's recognition and respect of the right of its people to associate freely, to join or form part of a trade union and bargain collectively. We recognize freedom of association for all.	All Group employees and non-employees in the workforce, including aircrew, engineering, ground operations and office staff	<ul style="list-style-type: none"> The Chief People Officer 	ILO Declaration on Fundamental Rights and Principles at Work, including the ILO declaration on the freedom of association and the right to collective bargaining	Internally Publicly
Group's Non-Discrimination policy (2025)	S1-IR023 S1-IR024	The Policy details specific procedures to prevent and mitigate discrimination, including how employees can raise issues or file reports regarding discrimination-related incidents in the workplace	All Group employees and non-employees in the workforce, including aircrew, engineering, ground operations and office staff	<ul style="list-style-type: none"> The Chief People Officer 	<p>The non-discrimination policy (2025) is in line with Article 1 of the Universal Declaration of Human Rights, all of our people are born free and equal in dignity and rights.</p> <p>The Group adheres to the ILO conventions on discrimination and the policy is aligned with this. We do not note alignment with other policies such as "UN Guiding principles on Business and Human Rights" and "The OECD Guidelines for Multinational enterprise" despite the overlap in principles.</p>	Internally Publicly
Group's Code of Conduct (2025)	S1-IR021 S1-IR022 S1-IR025 S1-IR026	Please refer to the "Business conduct policies and corporate culture" section on page 75.				

Note: For more information on the Group's agreements with worker's representatives, please refer to the "Collective Labor Agreements ("CLAs")" section on page 54.

Safety & Security

The SMS provides for the end-to-end management of the Group's safety performance and includes processes for effective information gathering, analysis, audit, and follow-up. To facilitate this oversight, control and supervision, the Group utilises an online system which is certified to the below standards:

- ISO 9001:2015;
- ISO 14001:2015;
- ISO 27001:2013;
- ISO 45001:2018; and
- ISO 26000.

The Group has not had a single customer or staff fatality in its 40-year operating history. This is primarily due to the comprehensive training and the rigorous procedures the Group has in place and the hard work of all colleagues throughout the Group. Management actively encourages flight crews to report any safety-related issues through the Safety Reporting system, which is available online. Also available to crew is the Ryanair Confidential Reporting System ("RCRS") which affords personnel the opportunity to report directly to Safety Officers any event, error, or discrepancy in operations that does not fall into the category of a mandatory report required by regulation, and they do not wish to report through standard reporting channels. The Company uses the de-identified information reported through all reporting channels to modify training and/or procedures and improve flight operations standards as necessary. Additionally, the Group promotes the use of CHIRP, a confidential reporting system that is endorsed by the UK CAA as an alternative confidential reporting channel.

Non-Discrimination and harassment

The Group's Non-Discrimination policy (2025) focuses on the importance of equality, diversity, and the elimination of discrimination irrespective of gender, age, disability, ethnic or racial origin, religion, belief, or sexual orientation.

The policy referenced above also details specific procedures to prevent and mitigate discrimination, including how employees can raise issues or file reports regarding discrimination-related incidents in the workplace to the HR department who will investigate the allegation in full and take corrective action as it deems warranted under the circumstances.

Human Rights

As noted in the Group's Code of Business & Ethics (2025), specifically the Slavery and Human Right Trafficking Statement, the Group does not tolerate any infringement of human rights, including the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude (whether adults or children) in any part of the business or supply chain.

Annual training on the Group's Code of Business Conduct and Ethics (2025) takes place. Reporting mechanisms and other information on can be found in the "Business conduct policies and corporate culture" on page 75.

Processes for engaging with own workforce and workers' representatives about impacts

Workforce engagement

The Chief People Officer has operational responsibility to ensure that workforce engagement occurs. Additionally, a NED is appointed to oversee Workforce Engagement. This NED attends Workforce Engagement consultation panels across the workforce and brings the feedback from these sessions back to the Board. This ensures that our people's voice is considered in Board decision making.

These consultation panels are held with workforce representatives from across the network, including pilots, cabin crew, engineering, ground operations, office support and Labs teams. The mix of attendees at each panel discussion (held with each group annually), provide valuable insights into the working conditions of our people.

The Group assesses the effectiveness of workforce engagement based on the valuable insights gained as part of the workforce engagement consultation panel discussions.

As noted earlier, Eamonn Brennan is the NED with oversight of workforce engagement. The Board includes Workforce Engagement as an agenda item at least quarterly. During FY25, Eamonn Brennan (as Workforce Engagement NED) built upon previous panel engagements and hosted several panel discussions with various teams including our cabin crew, engineers, ground ops, Labs team, office support staff and pilots. The mix of those in attendance at each of the panel discussions provided valuable insights into the working life of our people. Suggestions made at various panel discussions have subsequently been incorporated by the Group, including improvements to operational planning, staff travel and staff benefits. Eamonn Brennan reported to the Board on workforce engagement at least quarterly during FY25.

Regular meetings are held with union committees where updates are shared. The union committees have the opportunity to discuss any issues raised by their members. Generally, the unions will submit an agenda in advance of the meeting setting out the topics they wish to discuss. Such topics are typically addressed during the meeting and/or through correspondence.

Collective Labor Agreements (“CLAs”)

CLAs cover a number of areas including pay, benefits, working hours, roster, annual leave, promotions, transfers and other important topics. 97% of the Group’s pilots and cabin crew are covered by long term CLAs. For CSRD reporting purposes, the Group expanded the boundary of this metric to now include all employees (which includes administration and ground crew). This is reported in the “Collective bargaining coverage and social dialogue” section below.

CLAs are negotiated by HR, relevant Line Managers as well as the workforce representatives and union officials. These negotiated CLAs demonstrate effective and positive engagement between the Group, its union partners, and its employees.

Collective bargaining constitutes a material opportunity for the Group, as it enables the Group to address issues raised by employees and agree long term CLA’s with employee groups. These in turn provide security and stability on pay and working conditions for the employees covered.

The Group’s employees not covered by union CLAs can be represented by Employee Relations Committees (“ERCs”). An ERC includes a group of representatives, selected by employees (not represented by trade unions) in a specific department, which meets management to discuss any issues. ERCs allow groups which have chosen not to be represented by trade unions to negotiate with management and raise issues on behalf of their colleagues. These meetings allow the Group to provide important Company updates and identify any emerging issues.

Processes to remediate negative impacts and channels for own workers to raise concerns **Remediation and channels to raise concerns.**

During the DMA exercise, the Group did not identify any material negative impacts related to own workforce. However, the Group has identified certain processes that help prevent potential material negative impacts from arising (e.g. Grievance Procedure).

Employees can make a report of a concern of whistleblowing internally. For more information on specific channels for raising whistleblowing-related concerns, and the policies in place to protect individuals or workers’ representatives that use these channels against retaliation please refer to “ESRS G1 Business Conduct” on page 74.

HR track emerging trends and patterns brought to their attention within specific markets through a dedicated helpdesk for staff to contact internal departments across the network. This allows HR to get an insight of the employees’ queries and concerns which may also be addressed in subsequent representation meetings or through management communication on other initiatives. The Group also hosts regular forums with relevant personnel to provide Company updates, updates specific to the country the team operates in and allows our people to ask questions of management.

For information on the Group’s specific channel to report safety-related concerns and how the Group tracks and monitors such issues raised, please refer to the “Safety & Security” section on page 53.

The Group's grievance procedure provides its people with an accessible process to address work related problems or issues. The full grievance procedure is listed in the "Group's Rough Guide" (an onboarding document), which is provided to all new joiners, and which is accessible to all employees working within the Group via the internal company platform fleethub. This procedure ensures that issues are resolved in a prompt, consistent and fair manner.

The Group ensures that employees are made aware of these structures to raise concerns by incorporating the CBCE into the induction process. At-risk functions are offered training on the CBCE and the Policy annually. Training is provided to at-risk functions at least annually, and to all new employees in at risk functions on joining the Group to maintain up to date knowledge on the Group's business conduct compliance programme. In the context of the CBCE, at-risk functions are defined as people managers, as well as members of the Finance, Commercial, Legal and HR teams, the Executive Team and Board members. The volume of reports on the channels are an indicator that staff trust the process/channels and have no reservations in reporting anything they see fit, please see the "Whistleblowing" section for more information on page 79.

Taking action on material impacts on own workforce and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions.

Actions and metrics to manage IROs

Please note that during the DMA exercise, the Group did not identify any material negative impacts. As such, no actions are disclosed in relation to the remedy/mitigation or prevention of material negative impacts.

To deliver positive impacts, mitigate risks and pursue opportunities for its own workforce, including aircrew, engineering, ground operations and office staff the Group has taken the following actions (see Table 32), all of which are carried out continuously, and intended to be completed on a short-term basis.



Table 32 – Actions related to Own Workforce

IRO	Value Chain	Action(s) to improve social outcomes, mitigate risks and pursue opportunities	Expected Outcome	Tracking effectiveness	Metrics
S1-IRO17 S1-IRO18	Own Operations	<ol style="list-style-type: none"> As part of the unwavering commitment to safety, the Group continues to invest in and develop its SMS to ensure it is robust and facilitates the Group's goal of continuous improvement. This system provides a platform for end-to-end management of our safety and operational processes and includes processes for effective documentation, information gathering and audit. The Group will continue to build on its achievements which include: the safe introduction of the Boeing 737-8200 "Gamechanger" into our fleet; the successful roll out of the Group's Aircraft Communication Addressing and Reporting System ("ACARS"); and the successful launch of a new safety communications app to our pilots. Internal staff safety surveys are carried out to help identify potential aviation safety and/or security issues before they arise. The Group also has a rigorous procedure in place to review any incidents and accidents that do occur. The Group take on board any learnings the Group can and implement them into the Group's SOPs when appropriate. Our pilots and cabin crew are required to receive safety and emergency procedures training every 12 months. Although the Group seeks to maintain its fleet in a cost-effective manner, management does not extend the Group's low-cost operating strategy to the areas of safety, maintenance, training, or quality assurance. 	The Group will maintain its robust safety processes.	The Group Safety & Security Committee reviews and discusses air safety and security performance.	Health and safety metrics Table 39 – page 62.
S1-IRO19 S1-IRO20	Own Operations	<ol style="list-style-type: none"> To avoid the risk of industrial action, the Group holds regular meetings with recognised trade unions to discuss matters raised by employees via our union committees and negotiate long term collective agreements. Some industrial action is inevitable in a unionised environment. The Group's employees not covered by CLAs are represented by ERCs. An ERC includes a group of representatives, selected by employees (not represented by trade unions) in a specific department, which meets management to discuss any issues. These meetings allow the Group to provide important company updates and act as an early warning for any emerging negative issues. 	The Group will minimise industrial action.	The Group assesses the effectiveness of workforce engagement based on the valuable insights gained as part of the workforce engagement consultation panel discussions.	Collective bargaining coverage and social dialogue Table 37 – page 61.

IRO	Value Chain	Action(s) to improve social outcomes, mitigate risks and pursue opportunities	Expected Outcome	Tracking effectiveness	Metrics
S1-IRO21	Own Operations	<ol style="list-style-type: none"> The Group's employees are covered by social protection through State programmes in the relevant jurisdictions the Group operate from. All countries with Group base operations provide appropriate legislated family related leave entitlements. The Group's employees are entitled to annual leave as set by European and national legislation (at a minimum) as well as applicable CLAs. 		The HR & rostering systems track statutory leave to ensure entitlements are delivered.	Characteristics of undertakings employees Table 33 – page 59.
S1-IRO22	Own Operations	<ol style="list-style-type: none"> The Group prioritises work-life balance through the roster pattern of its workforce. Pilots typically work 5 days on 4 days off fixed roster and cabin crew work 5 days on and 3 days off fixed roster. These roster patterns give crew stability and planned time off. Cabin Crew and Pilots (who represent the majority of the Group's own workforce) are covered by strict Flight Time Limitations ("FTLs"), meaning they cannot fly in excess of 900 hours per calendar year (which equates to approximately 17 hours per week). Annually, pilots benefit from an average of 162 off days, whilst cabin crew benefit from an average of 135 off days in addition to applicable annual leave entitlements. The Group offer crew and pilots the opportunity to work flexi-rosters including early or late duties only and part-time rosters. Depending on operational requirements across the network, flight crew have an opportunity to benefit from extra time off on our roster. Voluntary time off ("VTO") becomes available at short notice via the Group's Connect App. Flight crew are notified of VTO available in their bases, and voluntarily choose to accept this additional time off. The introduction of VTO has allowed crew more flexibility in their working lives. The Group has a number of employees across its engineering, ground operations and office locations who work on fixed shift patterns with the remainder of colleagues working the standard 5 days on 2 days off. A hybrid remote working arrangement is also available for the majority of office-based colleagues. 	The Group will continue to prioritise its workforce's work-life balance.	Please refer to the "Remediation and channels to raise concerns" section, page 54	<p>Adequate wages – page 61.</p> <p>Characteristics of undertakings employees Table 33 – page 59.</p>

IRO	Value Chain	Action(s) to improve social outcomes, mitigate risks and pursue opportunities	Expected Outcome	Tracking effectiveness	Metrics
S1-IRO23 S1-IRO24	Own Operations	<p>1. One of the Group's challenges, along with all other airlines, is the low female representation in the pilot cohort. In fact, only 11% of 2024 pilot applicants were female. To address this, the Group launched a Zero Limits campaign in FY24 as part of International Women's Day ("IWD") to address the lack of visible role models for young women who may consider a career in aviation. A number of female students from across Ireland and the UK were invited to attend talks to hear inspirational stories and receive advice from the Group's female role models across all departments. The students were also given the opportunity to take a tour of the State-of-the-Art Airline Flight Academy in Dublin and meet with female pilots to learn tips on how they can embark on an academic and professional journey within the aviation industry.</p> <p>2. The Group is an official partner with Trinity Centre for People with Intellectual Disabilities ("TCPID"). The TCPID provides people who have intellectual disabilities with the opportunity to participate in a higher education programme designed to enhance our capacity to fully participate in society as independent adult through work placements. The aim of the course is to give students a route to third level education and access to a work environment.</p>	The Group will continue to increase the visibility of female aviation roles.	The Group tracks and assesses the effectiveness of these actions based on any complaints received in relation to a lack of workforce diversity.	<p>Characteristics of undertakings employees Table 33 – page 59.</p> <p>Diversity metrics Table 38– page 61.</p> <p>Incidents, complaints and severe human rights impacts Table 40 – page 62.</p> <p>Remuneration metrics page 62.</p>
S1-IRO25 S1-IRO26	Own Operations	<p>1. At 31 March, 2025, the Group owned and operated 10 state of the art, fixed base simulators as well as 9 Boeing 737-800NG, 9 Boeing 737-8200 and 1 A320 full flight simulators for pilot training.</p> <p>2. In FY25, the Group expanded its East Midlands Training Centre by acquiring a second facility allowing for additional capacity across both facilities. In FY25, the Group took delivery of 1 Boeing 737-8200 full flight simulator at the East Midlands Training Centre. This investment is incurred in the normal course of business.</p>	The Group will continue to invest in crew training.	Please refer to the "Workforce engagement" section, page 53.	The Group will report on 'Training and skills' metrics from FY26 (post phase-in provision)

Note: There is no significant, out of course spend, associated with implementing actions to grow opportunities or mitigate material risks.

2. Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.

Ryanair monitors the effectiveness of its social policies through various measures, as detailed in the Actions section. Progress is assessed annually, using indicators outlined in this section.

The Group is not disclosing information on targets (as required per ESRS S1-5) as the Group has chosen not to set any specific targets regarding workforce IROs at this time. This approach allows the Group flexibility to explore opportunities and respond quickly to the needs of the Group. This approach is reviewed annually.

Characteristics of the undertaking's employees

The Group has prepared its workforce related data for FY25, with reference to best practice, the definitions provided under the CSRD and leveraging other, long-established conventions. The Group has compiled the data using its HR records.

Table 33 – Employee headcount by gender as at March 31, 2025

Gender	Number of employees
Male	16,028
Female	9,923
Other	1
Not reported	0
Total employees	25,952

See Note 17 to the consolidated financial statements which also details headcount.

Table 34 – Employee headcount as at March 31, 2025, in countries the Group has at least 50 employees representing at least 10% of its total number of employees

Country	Number of employees
Spain	8,445
United Kingdom	3,954
Italy	3,245
Ireland	2,941
Other	7,367
Total employees	25,952

Table 35 – Information on employees by contract type, broken down by gender as at March 31, 2025

FY25 Employee Headcount				
	Female	Male	Other / Not disclosed	Total
Number of employees	9,923	16,028	1	25,952
Number of permanent employees	8,734	14,453	1	23,188
Number of temporary employees	1,189	1,575	0	2,764
Number of full-time employees	8,552	13,318	1	21,871
Number of part-time employees	1,371	2,710	0	4,081

In FY25, Ryanair did not employ any workers on non-guaranteed-hours contracts.

Table 36 – Information on Staff Turnover as at March 31, 2025

Staff Turnover (Number)	5,602
% of Staff Turnover	22%

The majority of turnover relates to seasonal workers in ground handling operations.

Methodologies and Assumptions

The Group bases its estimates and methodologies on historical experience, available information, and various other assumptions that it believes to be reasonable. For more information, please refer to the “Methodologies” section, page 84. The Group has prepared its workforce related data for the year ended March 31, 2025, with reference to best practice, the definitions provided under the CSRD and leveraging other, long-established conventions. To categorise its workforce, it has applied the following definitions:

- Employee – An individual who is in an employment relationship with the Group according to national law or practice:
 - a member of staff who is employed directly by the Group and who is paid directly by the Group.
- Non-employees – both individual contractors supplying labor to the Group (“self-employed people”) and people provided by the Group primarily engaged in “employment activities”:
 - someone who is employed directly by the Group but is paid through an agency or self-employed.
 - someone who is not employed directly by the Group but the company the Group works for has an exclusive contract with the Group and salaries are listed on the invoice.

Collective bargaining coverage and social dialogue

For more information on collective bargaining agreements, please refer to “Policies related to Own Workforce” section, page 52. Ryanair engages employee groups at a national level but no formal agreements are in place which were negotiated through European Works Council, Societas Europaea (“SE”) Works Councils or Societas Cooperativa Europaea (“SCE”) Works Councils. 84% of the Group’s employees are covered by collective bargaining agreements. Below is an additional presentation of coverage by collective bargaining agreements and workers’ representatives for EEA countries with significant employment (i.e. >10% of the total workforce).

Table 37 – Collective Bargaining Coverage / Social Dialogue

	Collective Bargaining Coverage	Social dialogue
Collective Bargaining Coverage Rate	Employees EEA	Workplace representation (EEA only)
0-19%		
20-39%		
40-59%	Ireland	
60-79%		
80-100%	Spain; Italy	Spain; Italy; Ireland

Diversity metrics

Table 38 – Gender distribution and age distribution in number and percentage

Distribution	Gender	Top management level	Percentage	Employee head count	Percentage
<30 years old	Female	-	0%	5,765	47%
	Male	-		6,360	
	Other / Not Reported	-		-	
30-50 years old	Female	1	50%	3,935	47%
	Male	4		8,356	
	Other / Not Reported	-		1	
>50 years old	Female	1	50%	221	6%
	Male	4		1,304	
	Other / Not Reported	-		-	

Adequate wages

The Group complies with all applicable national and European employment legislation including minimum wage and social benefit schemes. All employees are paid an adequate wage in line with this.

Health and safety metrics

Table 39 – Health and Safety Coverage metrics

Health and Safety Coverage	FY25
Percentage of employees who are covered by the undertaking's health and SMS system based on legal requirements and/or recognised standards or guidelines (head count basis)	100%
Number of fatalities of employees as a result of work-related injuries and work-related ill health	-
Number of fatalities as result of work-related ill health of other workers working on undertaking's sites	-
Number of recordable work-related accidents of employees	497
Rate of recordable work-related accidents of employees	10

Incidents, complaints and severe human rights impacts

Table 40 – Incidents, complaints and severe human rights impacts

Incidents/complaints related to human rights	FY25
Total number of substantiated incidents of discrimination, including harassment, reported in the reporting period	-
Number of complaints filed through channels for people in the Group workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises excluding those already reported in the first row above	46
Total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints relating to incidents of discrimination or harassment, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements	-
Number of severe human rights incidents connected to the undertaking's workforce in the reporting period, including an indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. If no such incidents have occurred, the undertaking shall state this	-
Total amount of fines, penalties and compensation for damages for any cases of severe human rights incidents (forced labor, human trafficking or child labor), and a reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements.	-

The data has been collated based on records and complaints brought to the attention of the HR department. There were 13 allegations of discrimination made in FY25. Following investigation, none were deemed to be founded. Further information of the Group's disclosure process is outlined in Table 47 – Business conduct policies and corporate culture (on page 75).

No severe human rights incidents connected to the entity's workforce have occurred in the reporting period.

Remuneration metrics

The Group is an equal opportunity employer and is proud to employ the thousands of aviation professionals (both male and female) who work hard to deliver exceptional service and Europe's lowest fares to its customers. Our Pilots and Cabin Crew are covered by negotiated agreements, under which our female employees are paid the same pay rates as their male colleagues.

The gender pay gap is 51% while the annual total remuneration ratio of the Group CEO to the median annual total remuneration is 1:142. This figure does not represent unequal pay but rather gender imbalance, and all airlines are materially affected by the low proportion of females who choose to enter the Pilot profession and the low proportion of men who choose careers as cabin crew.

Assumptions / Methodology

The gender pay gap looks at the difference between the average pay of all men and all women across the whole business, regardless of job type or seniority. It is calculated as the difference between the average pay of female employees and male employees, expressed as a percentage of the average pay of male employees. 'Pay' means gross annual pay and the corresponding gross hourly pay.

The annual total remuneration ratio is the ratio between the remuneration of the highest paid individual in the Group and the median remuneration.

Data underlying metrics is for Ryanair DAC only. Excluding Group CEO pay, the information is based on a preparation date of end June, 2024. See page 84 for more details on Methodologies.

Actions to reduce Gender Pay Gap

The Group continue in our commitment to gradually increase the proportion of female pilots in the aviation industry through our social media campaigns and numerous initiatives including female representation at Pilot career promotion and recruitment events. Additionally, the Group will continue to ensure that all hiring practices are inclusive, promote diversity and are gender neutral.



ESRS S4 – CONSUMERS AND END-USERS

1. Impact, risk, and opportunity management

Table 41 – Consumers and End Users IROs

Information-related impacts for consumers and/or end-user				
S4-IR027	Risk	Downstream	Medium-term	The possibility of fines and increased operating costs due to the Group's accidental loss or misuse of customer information.
S4-IR028	Negative Impact	Downstream	Medium-term	Customer's personal information could be leaked if the Group does not maintain adequate processes, systems and safeguards (e.g., firewalls and encryption).
S4-IR029	Positive Impact	Downstream	Medium-term	The Group has a positive impact on the lifestyle of customers through the provision of safe, affordable, reliable, and accessible flights at competitive prices across an extensive number of locations. The service enables customers to access new destinations safely and responsibly.
Personal safety of consumers and end users				
S4-IR030	Positive Impact	Downstream	Medium-term	Maintaining a high level of health and safety.
S4-IR031	Risk	Downstream	Medium-term	The reputational and operational impact of severe and/or fatal accidents to passengers caused by the Group's or its suppliers actions.

Material IROs and their interaction with our strategy and business model

The Group's customers subject to "material impacts by its own operations or through its value chain" are defined as 'passengers'.

The impacts related to the Group's passengers arise in the Group's downstream value chain. With the exception of the potential of accidents occurring as a result of supplier negligence, all other potential impacts would arise as a result of the Group's own activities. The Group's services have the potential to negatively impact on passenger's privacy rights and data protection. All material risks identified are integrated into the ERM with further detail disclosed in the "Risk Factors" section, page 164 of the Annual Report. Positive impacts on the Group's passengers arise through the provision of safe, affordable, reliable, and accessible flights at competitive prices across an extensive number of locations.

The Group's material risks relate to all passengers. There is no expectation of a risk of material adjustment for accounting purposes in the next reporting period as a result of the risks identified. The Group's resilience to each of its negative impacts and risks is detailed throughout this section.

The Board is responsible for overseeing management's assessment of major risks and there's a specific function responsible for current and emerging cybersecurity matters. Regular meetings are held with the Head of Information Security and the Chief Technology Officer ("CTO") to provide visibility of major issues and seek alignment with strategy.

Table 42 – Policies related to Consumers and End-Users

Policy	IRO	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability
Information Security Policy (2024)	S4-IR027 S4-IR028	The purpose of the Information Security policy (2024) is to protect the Group's information assets and systems from all threats, whether internal or external, deliberate or accidental. The key contents covered by the policy include end user responsibility, media movement, clear desk, data disposal, email, communication and internet, password management, physical security, device security, third-party security, and cloud security.	The Information Security Policy (2024) applies to networks, systems, processes, people, and data (including commercial, employee and customer data) belonging to the Group or its clients. Networks are considered all physical, virtual and cloud networks owned, managed, or used by the Group. Systems include all hardware (e.g., servers, firewalls, etc.), devices (e.g., PCs, laptops and mobile devices) and software. Data assets include all physical media and electronic data formats.	<ul style="list-style-type: none"> Board of Directors CTO Head of Information Security Information Security Team 	<ul style="list-style-type: none"> ISO/IEC 27001 Information Security Management PCI Data Security Standards OWASP SANS Institute National Institute of Standards and Technology (NIST) – 800-53 Standard Center for Internet Security (CIS) EU General Data Protection Regulation ("GDPR") 	Internally & Publicly
Privacy Policy (2025)	S4-IR027 S4-IR028	The Group's customer data is required to be processed in accordance with the Privacy Policy (2025) (which conforms to the Company Data Protection Policy approved by the Board) and in compliance with applicable laws, including the EU GDPR. The Group is committed to protecting customer privacy and takes its responsibility regarding the security of customer information very seriously.	The Group's Data Protection Team operates with a clear mandate: to mitigate risks, create a robust framework for data privacy, and ensure compliance with applicable laws.	<ul style="list-style-type: none"> Group CLO DPO Data Protection Team 	<p>All personal data is collected and processed in accordance with EU, UK and various national data protection laws as applicable.</p> <ul style="list-style-type: none"> UK Data Protection Act 2018 Irish Data Protection Act 2018 EU GDPR 	Internally & Publicly
Group's Terms & Conditions of Carriage	S4-IR031	As a passenger airline, the Group has a commitment to treat all its passengers in accordance with applicable EU and national legislation. The rights of passengers that require special assistance is covered in Article 5 of these Terms & Conditions	The Group's Terms & Conditions of Carriage details the contractual basis on which the Group's airlines provide air transport services to its passengers.	<ul style="list-style-type: none"> Director of Customer Service 	<ul style="list-style-type: none"> Regulation (EC) No 261/2004 of the European Parliament and of the Council of February 11, 2004, establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights, and repealing Regulation (EEC) No 295/91. The Air Passenger Rights and Air Travel Organisers' Licensing (Amendment) (EU Exit) Regulations 2019. 	Publicly

Policy	IRO	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability
Safety & Security Strategy (2025 - 2029)	S4-IRO29 S4-IRO30	For information on the Group's Corporate Safety Strategy policy (2025-2029), please refer to the "Policies related to Own Workforce" section, page 52. For information on how safety is incorporated in the Group's Supplier Code of Conduct (2024), please refer to the "Supplier Relationship management" section on page 80.				
Non-discrimination policy (2025)	S4-IRO31	The Group's Non-discrimination Policy (2025) sets out that our people must treat everyone fairly, equally and without discrimination irrespective of gender, age, disability, ethnic or racial origin, religion, belief or sexual orientation. For information on this policy, please refer to page 53. The Group adheres to the ILO conventions on discrimination and the policy is aligned with this. We do not note alignment with other policies such as "UN Guiding principles on Business and Human Rights" and "The OECD Guidelines for Multinational enterprise" despite the overlap in principles.				
Group's Code of Business Conduct & Ethics (2025)	S4-IRO31	As per the Group's CBCE, specifically the Slavery and Human Right Trafficking Statement, the Group does not tolerate any infringement of human rights, including the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude (whether adults or children) in any part of the business or supply chain. Please note that no severe human rights issues and incidents connected to the Group's passengers have been reported. Please refer to the "Business conduct policies and corporate culture" section, page 75.				
Group's Supplier Code of Conduct (2024)	S4-IRO31	As per the Group's Supplier Code of Conduct (2024), suppliers are expected to respect the Group's commitment to inclusion, diversity and respect of human rights. For information on this policy, please refer to the "Business conduct policies and corporate culture" section, page 75.				

Notes:

1. Please refer to General Terms & Conditions of carriage, Article 5 – Special assistance, sub-paragraph 5.2.3. for the Group's remedy measures for human rights impacts. These terms also outline the process for recording any complaint or disputes.
2. The passenger always has the right to make a complaint at any time to a supervisory authority. The Irish Data Protection Commission is one of the lead data protection supervisory authorities for the Group.

Processes for engaging with consumers and end-users about impacts

The Group is motivated by, and set actions based on, customer feedback. Monthly meetings are held with senior management to review progress on delivering actions and track our effectiveness on improving the Group's customer experience. The Group's approach to customer engagement is multifaceted and is led by Ryanair's Director of Customer Service.

After a successful launch of the "Day of Travel Assistant" in the Group app in FY22, the Group has continued to enhance the features available through this service, supporting passengers with information on boarding gates, boarding times, gate closure, updated Expected Time of Departures ("ETDs") in the event of delays, and videos explaining what is happening and what to expect next. The Group has an ongoing commitment to improving customer satisfaction across the customer journey and this is measured by regular post flight customer satisfaction ("CSAT") surveys and "mystery-passenger" flights. The Group continues to achieve industry leading results, surpassing internal targets and improving results year on year.

Every passenger who flies with the Group can rate their flying experience. For information on how the Group engages with passengers about impacts, please refer to the "Information on the Company" section on page 184 of the Annual Report. During FY25, we continued the success of the "We're Listening" initiative (first launched in 2021) by holding workshops with panellists representing 10 countries in both Madrid and Dublin. These events help the Group to stay in touch with our customers' needs and wants, particularly as the Group continues its self-service journey, and help the Group to evaluate the new technology it plans to launch and informs management on improvements they need to make to the website, mobile applications, and customer communications. The Group has delivered a new customer portal in the customer's My Ryanair account, allowing customers to interact with the Group through a secure service portal, providing timely responses to common questions and updates on refunds, claims and queries.

Assessment of passenger engagement

The Group's CSAT score is the key performance indicator that measures how satisfied our customers are across every aspect of our flight with us, from booking experience, through to our inflight experience.

The Net Promoter Score ("NPS") is a market research tool that is based on a single survey question asking respondents to rate the likelihood that they would recommend a company to a friend or colleagues – Would you recommend the Group to a friend? Each quarter the Group send a survey to customers to track their overall sentiment towards Ryanair. This survey is sent to a randomly selected pool of customers who travelled with the Group in the last year. The Group also run an annual brand 'benchmark' NPS tracker which is completed by a third-party research agency and surveys the Group sentiment to a panel of respondents beyond the Group customer base and assesses our performance relative to key competitors in each of our top markets.



Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Cyber Security

The Group has an incident response plan in place that sets out ways for people throughout the Group to identify, mitigate the impact of, and effectively deal with data breaches, as well as the Group's obligation to notify breaches to the relevant authorities. The plan determines timelines, roles, and responsibilities, placing the Head of Information Security and the Data Protection Officer ("DPO") at the centre of it.

The Group carries out Cyber Security Tabletop exercises. This is also a requirement as part of National Institute of Standards and Technology ("NIST") Framework engagements. The process is also reviewed as part of our Bi-Annual NIST Cyber Security Assessment carried out by a 3rd Party (NCC Group).

Contact Centres

The Group has a specialist multinational team of customer service experts dedicated to helping our customers when things do not go to plan. The Group's contact centres are its support channels for passenger queries. Passengers can contact these centres to ask about bookings and raise any issues they may have. The contact centres are also tasked with dealing with any data management complaints. Any issues raised through the Group's contact centres will be treated confidentially and in accordance with all data protection requirements. Passengers can contact any of the Group's contact centres through calls, chat, emails, or forms. Details on how to contact us feature prominently on the Group's website, its main way of communicating with customers. The contact centres have the aim of answering all customer queries in as timely and efficient manner as possible. To manage this performance and to monitor and track effectiveness of these channels, Group management receive daily reports that track all contacts on the Group's platforms including daily answer rates, wait time, etc. For passengers wishing to raise a concern with the Group, contact details are available on the Group's website.

The Group does not assess whether and how consumers are aware of and trust the channels it has in place for passengers to raise their concerns or needs, however the volume of engagement on the channels signals that the Group's passengers are aware. The Group is subject to the Consumer Protection Act. It contains clauses that discuss good faith and fair dealing.

Taking action on material impacts on consumers and end-users, and approaches to managing material risks related to consumers and end-users, and effectiveness of those activities

To deliver positive impacts for, or mitigate negative impacts and risks to, its passengers, the Group has taken the following actions, all of which are carried out continuously, and intended to be completed on a short-term basis.

The Group has taken the following actions to prevent, mitigate or remediate the material negative impact that may arise for passengers:

Table 43 – Mechanisms and actions to prevent, mitigate or remediate the negative impact

IRO	Value Chain	Action(s) to prevent, mitigate or remediate social outcomes	Tracking effectiveness
S4-IRO28	Downstream	<p>Ongoing training and awareness:</p> <ul style="list-style-type: none"> Induction Training: Data protection is woven into the fabric of the Group from day one. During induction training, relevant colleagues receive comprehensive guidance on data privacy principles, our responsibilities, and the importance of handling data with care. By instilling this knowledge early on, employees are empowered to make informed decisions. Recurrent Training: Staying up to date with evolving regulations is crucial. Data protection training is provided annually. This ensures that everyone remains informed about changes in laws, best practices, and emerging risks. Whether it is understanding the intricacies of the EU GDPR or learning about specific data handling scenarios, the Group's recurrent training keeps our team well-prepared. Tailored Approach: One size does not fit all when it comes to data protection training. The Group's Data Protection Team identifies specific groups within the organisation that may require more frequent or specialised training. Whether it is a department dealing with sensitive customer data or a team handling employee records, targeted training ensures that everyone understands the nuances relevant to their roles. <p>Responsible data handling practices</p> <ul style="list-style-type: none"> Purpose-Limited Processing: Processing data only for valid business purposes is emphasised. Collecting and retaining data beyond what is necessary not only increases risk but also goes against the principles of data minimisation. Colleagues are made aware that every piece of data handled must serve a clear purpose. Best-Practice Data Handling: The Group's Data Protection and Information Security policies ensure that data handling, including encryption, access controls or transfers, aligns with business ethics' international best practice. Chapter 8 of the GDPR details the remedies available to customers if these processes are not followed. Supplier engagement: As part of the Supplier onboarding process, a Data Protection Risk Assessment is carried out. If, during the relationship, the supplier has been found to fall below the data protection standards expected, the Group holds the right to terminate the contract. Reviews and challenges: The Group's Data Privacy Policy is continuously reviewed by its Customer Service and Data Protection teams. Changes are reviewed by the Group's Data Protection Committee before publication. 	<ul style="list-style-type: none"> The Group is proactive with cyber security testing, frequently conducting simulated phishing tests. Individuals who fail the test are required to undergo additional training. Audit-Driven Insights: Regular audits conducted by the Data Protection Team provide valuable insights. When audit findings highlight areas of concern or potential risks, the Data Protection Team responds promptly by providing targeted training. This proactive approach minimises the risk of inadvertent breaches and reinforces compliance. It is the Data Protection Team's responsibility to track and monitor any privacy issues raised by the Group's customers and ensure the correct processes are followed.

IRO	Value Chain	Action(s) to prevent, mitigate or remediate social outcomes (continued)	Tracking effectiveness
		<p>Assurance for stakeholders</p> <ul style="list-style-type: none"> Compliance and Transparency: The Group is committed to regulatory compliance. Stakeholders, including customers, employees, and business partners, need assurance that our data is in safe hands. By adhering to data protection laws and best practices, trust is built and the Group's commitment to responsible data management is demonstrated. Should anyone wish to raise privacy concerns or needs directly, the Group's Privacy Policy (2025) on the Group website includes contact details. The Group's Data Protection Team is responsible for ensuring compliance with data protection regulations; it also champions privacy rights, educates colleagues, and ensures that it is understood across the Group that data protection is everyone's responsibility. 	

The Group has taken the following actions to positively contribute to improved social outcomes for passengers:

Table 44 – Actions in place to improve social outcomes

IRO	Value Chain	Action(s) in place to improve social outcomes	Tracking effectiveness
S4-IRO29	Downstream	<ul style="list-style-type: none"> The Group's management of delays saw the biggest year-on-year improvement (in terms of customer feedback), driven by better and more timely communications during disruptions through the Day of Travel feature on the Ryanair App. Efforts across the inflight experience such as improved lighting, new customer announcements on board and commitment to aircraft appearance and overall ambience, resulted in a significant improvement in the customer experience. New airport wayfinding and navigation branding alongside new pre-flight communications through our Day of Travel App contributed to an uplift in satisfaction with our Boarding experience. Updates to our contact centre including interactive voice response and a reduction in centre wait times made a considerable, positive impact on our customer's interaction with our Customer Service team. The Group has a specialist multinational team of customer service experts dedicated to helping our customers when things don't go to plan. Our customer contact centres work seven days a week, 364 days a year to deliver the standard of care our customers have come to expect. 	For information on how the Group tracks and assesses the effectiveness of actions to positively contribute to social outcomes for customers, please refer to the "Processes for engaging with consumers and end-users about impacts" section, page 67.
S4- IRO30	Downstream	<ul style="list-style-type: none"> Our pilots and cabin crew are required to receive safety and emergency procedures training every 12 months. Management actively encourages flight crews to report any safety-related issues through the Safety Reporting system, which is available online. Also available to crew is the Group's RCRS which affords personnel the opportunity to report directly to Safety Officers any event, error, or discrepancy in operations that does not fall into the category of a mandatory report required by regulation, and they do not wish to report through standard reporting channels. 	The Group has not had a single customer or staff fatality in its 40-year operating history. This is thanks primarily to the comprehensive training and the rigorous procedures the Group has in place and the hard work of all our colleagues throughout the Group.

Assessment of actions

- The Group developed an incident response plan to manage negative impacts to passengers, for more detail, please refer to the "Processes to remediate negative impacts and channels for consumers and end-users to raise concerns" section, page 68.

The Group has taken the following actions to mitigate material risks from arising for passengers:

Table 45 – Actions in place to mitigate material risks

IRO	Value Chain	Action(s) in place to mitigate social risks	Tracking effectiveness
S4-IP027	Down-stream	<ul style="list-style-type: none"> For information on how the Group uses responsible data handling practices to mitigate material risks, please refer to Table 43 – “Actions to prevent, mitigate or remediate the negative impact”, page 69. 	For information on how the Group tracks and assesses the effectiveness of actions to positively contribute to social outcomes for customers, please refer to the “Processes for engaging with consumers and end-users about impacts” section, page 67.
S4-IP031	Down-stream	<ul style="list-style-type: none"> The Group’s has published a Supplier Code of Conduct (2024) that sets out the expectations the Group has for its suppliers, including health and safety expectations. The Group is reliant on some key suppliers to deliver a safe and high-quality service. The Group’s key suppliers are subject to routine audit and inspection, control and oversight. The Group has service level agreements in place that clearly state the standards suppliers are expected to achieve and maintain. If the supplier is a regulated entity, the Group also leverages the work of the regulator to identify any issues and as a way to enforce high standards. The Group conducts risk assessments and appropriate audits with key suppliers to assess compliance with the Supplier Code of Conduct (2024). For more information on the actions the Group requires suppliers to take to mitigate the risk of a safety incident from occurring and the resources the Group allocates to the management of this action, please refer to the “Safety & Security” section. Operating in a highly regulated industry like aviation, the Group welcomes the regulatory oversight and obligations that it must adhere to. The Group develops an annual safety audit schedule that takes account of regulatory requirements, additional Group Policies and Procedures, the size of the operation and the safety performance. For information on the actions taken to mitigate the risk of safety incidents from occurring, and the resources the Group allocates to the management of this action please refer to the “Actions related to own workforce” section, page 56. 	

Actions in place to pursue material opportunities.

The Group have not identified any material opportunities as part of the DMA exercise and therefore have not developed actions to pursue material opportunities.

Resource allocation

There is no significant, out of course spend, associated with implementing actions to grow opportunities or mitigate material risks or negative impacts.

2. Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.

Advancing positive impacts on consumers/end users

Ryanair's CSAT score is the key performance indicator that measures how satisfied our customers are across every aspect of their flight with us, from booking experience, through to their inflight experience. The Group has a CSAT target of 85% which is set internally and is reassessed annually. The Group's FY25 CSAT score was 86% (FY24: 85%).

The Group has chosen not to publicly set any specific targets regarding other consumer/end user IROs at this time. This approach allows the Group flexibility to explore opportunities and respond quickly to the needs of the Group. This approach is kept under review.



ESRS G1 – BUSINESS CONDUCT

1. Impact, risk, and opportunity management

Table 46 – ESRS 2 Corporate Culture, Protection of whistleblowers, suppliers and Corruption and Bribery IROs

Corporate Culture				
G1-IRO32	Risk	Own Operations	Short and Medium-term	The possibility of fines and reputational damage if there is unethical conduct by the Group's top management.
Protection of whistleblowers				
G1-IRO33	Positive Impact	Own Operations	Medium-term	Complying with laws and outlining a code of conduct protecting those that make protected disclosures allow employees to speak up and raise issues
Management of relationships with suppliers including payment practices				
G1-IRO34	Risk	Own Operations	Short and Medium-term	Potential of not fulfilling services due to damaged supplier relationships resulting from failure to comply with contractual agreements.
Corruption and Bribery				
G1-IRO35	Risk	Own Operations	Short and Medium-term	The possibility of fines and reputational damage resulting from breaching anti-corruption and bribery laws.

Material IROs and their interaction with our strategy and business model

Responsible conduct in compliance with legislation is a key element of the Group's corporate culture and is embedded in the Group strategy. The Group seeks to reduce the risk of misconduct and to positively influence employee retention through a responsible corporate culture. Through the protection of whistleblowers and by providing regular training on anti-corruption, the Group aims to promote transparency and prevent cases of corruption. The Group's resilience to material risks identified is detailed throughout this section.

Table 47 – Business conduct policies and corporate culture

Policy	IRO	Topics addressed	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability
Group's CBCE (2025)	G1-IRO32 G1-IRO33 G1-IRO34 G1-IRO35	Corporate Culture Protection of Whistleblowers Corruption and bribery	The CBCE sets out the principles that constitute the Group's way of doing business including managing conflicts of interest and issues relating to the work environment.	This CBCE applies and is addressed to all persons working for the Group or on the Group's behalf in any capacity, including Directors, whether full-time, part-time, fixed-term and/or agency employees or contractors.	<ul style="list-style-type: none"> The Board of Directors has overall responsibility for the CBCE. The Group CEO and management at all levels of the Group are responsible for ensuring adherence to the CBCE. The Internal Audit team monitor the implementation of the CBCE through the internal audit process. The Group CLO has day-to-day responsibility for monitoring and updating the CBCE. 	<p>The Group is committed to conducting business in an ethical fashion that complies with all laws and regulations in the countries in which the Group operate.</p> <ul style="list-style-type: none"> EU Whistleblowing Directive (2019/1937) Protected Disclosures Act 2014 and the Protected Disclosures (Amendment) Act 2022 ("the 2022 Act EU and Irish data protection laws 	Internally & Publicly
Whistleblowing Policy and Procedure (Within the "CBCE")	G1-IRO33	Protection of Whistleblowers	This policy is an internal procedure for the purposes of the Whistleblowing Directive and national implementing legislation.	<p>The Group's Whistleblowing Policy and Procedures applies to all employees, workers, agency workers, interns, job applicants, Board members, shareholders, consultants, contractors, sub-contractors, trainees or volunteers, who may report a breach of which they became aware in the context of pre-contractual negotiations or during an employment/engagement which has since ended.</p>	<ul style="list-style-type: none"> The Board of Directors has overall responsibility for the CBCE. The Group CEO and management at all levels of the Group are responsible for ensuring adherence to the CBCE. 	<ul style="list-style-type: none"> EU Whistleblowing Directive (2019/1937) Protected Disclosures Act 2014 and the Protected Disclosures (Amendment) Act 2022 ("the 2022 Act). 	Internally & Publicly

Policy	IRO	Topics addressed	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability
Group's ABAC Policy (2022)	G1-IRO35	Corruption and bribery	The ABAC Policy (2022) details the means in place to prevent, detect and address any potential incidents of corruption and bribery.	This Policy applies and is addressed to all persons working for the Group or on behalf of the Group in any capacity, including Directors, whether full-time, part-time, fixed-term and/or agency employees, contractors, external consultants, third-party representatives, and business partners.	<ul style="list-style-type: none"> The Board of Directors has overall responsibility for this Policy. The Group CFO has day-to-day responsibility for monitoring and updating the ABAC policy. The Internal Audit team monitor the implementation of the ABAC Policy through the internal audit process. 	<ul style="list-style-type: none"> The Irish Criminal Justice (Corruption Offences) Act 2018, which aligns with the United Nations Convention Against Corruption The U.S Foreign Corrupt Practices Act 1977. The UK Bribery Act 2010. The Italian Criminal Code (with particular reference to articles 316 et seq.). The Italian Legislative Decree no. 231 of June 8, 2001. The Italian Law no. 190 of 6 November 2012 (collectively, the Anti-Corruption Laws). 	Internally & Publicly
Supplier Code of Conduct (2024)	G1-IRO34	Management of relationships with suppliers including payment practices	The Group's Supplier Code of Conduct (2024) sets out the Group's expectations on those who provide our goods and services. It complements the CBCE (2025). It details the Group's expectations on suppliers with regards to Health & Safety, Environmental & Energy Management, Non-Discrimination, Human Rights and bribery & corruption.	<p>Must be adhered to by all of the Groups suppliers; third-party organisations that provide goods or services to or on behalf of the Group. This includes suppliers' officers, employees and third parties sub-contracted by a supplier.</p> <p>This Supplier Code of Conduct (2024) does not apply to individual contractors, agents, or intermediaries.</p>	<ul style="list-style-type: none"> Day-to-day management of the supplier relationship is delegated to the relevant relationship manager. The Chief Sustainability Officer is responsible for the implementation of Supplier Code of Conduct (2024). 	<ul style="list-style-type: none"> The International Labor Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work. Modern Slavery Act 2015 (UK). Criminal Law (Human Trafficking) Act 2008 (Ireland). Criminal Law (Human Trafficking) (Amendment) Act 2013 (Ireland) 	Internally & Publicly

Note: ABAC Policy (2022) – Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

Anti-bribery and anti-corruption

Group's CBCE (2025)

The CBCE sets out the principles that constitute the Group's way of doing business including managing conflicts of interest and issues relating to the work environment. The CBCE also explains how those raising protected disclosures are kept informed of the investigation's progress/outcome. In the context of the CBCE, at-risk functions are defined as people managers, as well as all members of the Finance, Commercial, Legal and HR departments, the Executive Team and Board members. Employees are also bound by the terms of their contract of employment and the "The Group Rough Guide" which contains employees' terms and conditions of employment with the Group as amended from time to time.

Group's ABAC (2022)

The ABAC Policy (2022) details the means in place to prevent, detect and address any potential incidents of corruption and bribery. The onus is on the member of staff to report if a bribe has been offered or whether the Group suspect that any breach of the ABAC Policy (2022) has taken place. They should create a culture in which every employee and any third party to which the Group outsources work, knows that the Group will not tolerate bribery or any form of corrupt practice. Both the CBCE and the ABAC will be reviewed and, if necessary, updated. Any significant deviations from the CBCE or the ABAC Policy (2022) are reported to the Audit Committee.

Mechanisms to identify, report and investigate contradictions to Business Conduct policies and Corporate Culture

The CBCE and ABAC Policy includes details on the mechanisms of identifying, reporting and investigating any contraventions:

To prevent corruption and bribery, the Group has taken the following actions, all of which are carried out continuously, and intended to be completed on a short-term basis.

Table 48 – Actions related to Business Conduct

IRO	Value Chain	Action(s) in place to improve social outcomes	Metrics
G1-IR032 G1-IR033 G1-IR034 G1-IR035	Own Operations	<p>1. Identifying & Reporting</p> <ul style="list-style-type: none"> The disclosure of a concern by an employee, worker, agency worker, intern, job applicant, Board member, shareholder, consultant, contractor, sub-contractor, trainee, volunteer, or a person who reports a breach of which they became aware in the context of pre-contractual negotiations or during an employment/engagement which has since ended, which that person reasonably believes involves or tends to show improper or illegal activities. If the employee is offered a bribe, or are asked to make one, or if they suspect that any bribery, corruption or breach or non-compliance with this policy has occurred or may occur, the employee must notify their line manager or HR manager or write to or speak with any of the Group CFO, Group CLO, Chief Risk Officer, Chief People Officer, or the Chief Executive / Managing Director of their local operating company without delay. In the event that the employee feels that they are unable to discuss this matter internally, they should refer to the Whistleblowing Policy and Procedures. The employee must clearly state that they wish for the report to be considered under the Whistleblowing Policy and they must provide a justification for the report being considered as such. Employees can also make a report of a concern of whistleblowing via third-party/external reporting channels: Reporters are encouraged to first disclose their concerns to the Group. Reporters are also entitled to make a report to the relevant prescribed persons listed on gov.ie or to the Protected Disclosures Commissioner if the reporter reasonably believes that the information the reporter discloses and any allegation in it are substantially true. <p>2. Investigating</p> <ul style="list-style-type: none"> If a report is found to be within the scope of the CBCE policy and sufficient grounds for an investigation are established, a report will be thoroughly investigated by a competent, impartial person or persons. Any person to whom this Policy applies who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct. Breaches of the Anti-Corruption Laws could also subject the individual who committed the violation to civil or criminal penalties, including substantial fines and potentially lengthy imprisonment. Any person other than an employee who breaches this Policy may have their contract terminated with immediate effect. <p>3. Training and Prevention</p> <ul style="list-style-type: none"> Training is offered to at-risk functions at least annually, and to all new employees in at-risk functions on joining the Group. In the context of the CBCE (2025), at-risk functions are defined as people managers, as well as all members of the Finance, Commercial, Legal and HR departments, the Executive Team and Board members. <p>4. Protection</p> <ul style="list-style-type: none"> The Group is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. 	<p>At-risk functions have an opportunity to attend regular training on the CBCE and ABAC Policy annually.</p> <p>CBCE training will form part of "Training and skills development metrics" reportable for the Group from FY26.</p>

Whistleblowing

Table 49 – Action(s) to protect whistleblowers

IRO	Value Chain	Action(s) in place to improve social outcomes	Whistleblower Protection Feedback
G1-IR032 G1-IR033 G1-IR034 G1-IR035	Own Operations	<p>Reporting Channels</p> <ul style="list-style-type: none"> The CBCE forms part of the induction process for all employees, and regular training on matters covered by this Code will be provided as necessary. All relevant employees have an obligation to attend regular training when requested and provided, review the materials provided and maintain up to date knowledge in relation to the Group's business conduct compliance programme. Training will be offered to all relevant employees at least annually, and to all new relevant employees on joining the Group. <p>Protection of whistleblowers</p> <ul style="list-style-type: none"> The Group is subject to the Protected Disclosures Act 2014 and the Protected Disclosures (Amendment) Act 2022 ("the 2022 Act"). The 2022 Act transposes the EU Whistleblowing Directive into law. This legislation protects those making a legitimate protected disclosure from being penalised or punished. Any protected disclosures submitted through internal channels will be submitted to the Whistleblowing Committee. Our people have the right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimised. The Group is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. If a reporter raises a genuine concern under the Whistleblowing Policy and Procedures, the Group will ensure that none of the protected persons under the Whistleblowing Directive (those being the reporter, his/her facilitator, a third person who is connected with the reporter and who could suffer retaliation in a work-related context (e.g., a colleague or a relative of the reporter), or a legal entity that the reporter owns, works for or is otherwise connected with in a work related context) will be at risk of suffering any form of penalisation by the Group as a result. Provided that a reporter has a reasonable belief that wrongdoing is occurring or is likely to occur, it does not matter if he/she is mistaken. If a reporter believes that he/she has suffered any such treatment, he/she should inform the Chief People Officer. If the matter is not remedied, the reporter should raise it formally using the Group's grievance procedure. Any employee found deterring another staff member from raising a valid concern or concealing evidence relating to that concern may be subject to disciplinary action, up to and including dismissal. Employees are prohibited from threatening or retaliating against reporters in any way (including those who raise concerns anonymously and are subsequently identified). Staff involved in such activity may be subject to disciplinary action, up to and including dismissal. 	Feedback will be provided to the reporter in respect of the progress of any investigation and its likely timescale within 3 months of acknowledgement of receipt of their report or such shorter period as may be required by national law.

Supplier Relationship Management

• Policy to prevent late payments

The Group recognises the importance of timely supplier payments. The Group's financial practices help ensure payments are made in line with agreed payment terms. Its internal processes are structured to manage deadlines effectively, and as a result, instances of late payments are infrequent.

Standard payment terms are typically at least 30 days from the month end of receipt of the invoice. These terms apply to the majority of invoices including SME payments, engineering invoices and other categories. However, in certain cases, these can be negotiated for individual vendors, on a case by case basis.

• Supplier Code of Conduct (2024)

The Group's Supplier Code of Conduct (2024) sets out the Group's expectations on those who provide our goods and services. It complements the CBCE (2025). It details the Group's expectations on suppliers with regards to health & safety, environmental & energy management, non-discrimination, human rights and bribery and corruption. The Group encourages suppliers to carry out operations with care for the environment and at a minimum comply with applicable environmental laws and regulations. Full details of steps the Group encourages suppliers to take are outlined within the Supplier Code of Conduct (2024). Willingness to adhere to the Supplier Code is considered in the selection of suppliers.

The Group's Supplier Code of Conduct (2024) also states that safety is at the centre of everything the Group does, and the Group expect their suppliers to operate in a manner which is safe and in compliance with applicable safety legislation. The Supplier code of Conduct (2024) sets out the following:

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

The Group also expects its 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 labor. 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;
- 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.

Table 50 – Actions to manage relationships with suppliers

IRO	Value Chain	Action(s) to manage relationship with suppliers	Metrics
G1-IRO34	Own Operations	<ul style="list-style-type: none"> As part of the supplier onboarding process, the supplier is issued a vendor number and contact details for the dedicated Accounts Payable (“AP”) representative within the Group. The AP representative is responsible for liaising with the vendor in relation to all payment/ invoice related matters. The Group engages with fuel suppliers on SAF production pathways and feedstock types to best reduce emissions. The Group conducts risk assessments and appropriate audits to assess compliance with the Supplier code of conduct. 	Table 52 – Payment Practices metrics on page 82.

2. Metrics and targets

Ryanair monitors the effectiveness of its governance policies through various measures, as detailed in the Actions section on page 78. Progress is assessed annually, using indicators outlined in this section.

The Group is not disclosing information on targets as the Group has chosen not to set any specific targets regarding governance IROs at this time. This approach allows the Group flexibility to explore opportunities and respond quickly to the needs of the Group. This approach is reviewed annually.

Incidents of corruption or bribery

Table 51 – Anti Bribery & Anti Corruption metrics

Anti Bribery & Corruption	
Number of convictions for violation of ABAC laws (incl. incidents involving actors of the value chain where Group employees are involved)	0
Amount of fines for violation of ABAC laws (incl. incidents involving actors of the value chain where Group employees are involved)	0

Payment Practices

Table 52 – Payment Practices metrics

Disclosure	2025
Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated	41 days
Percentage of payments aligned with standard payment terms by main category of suppliers	c. 86%
Number of outstanding legal proceedings for late payments	0

For detailed information on methodologies, please refer to page 84.

APPENDIX

1. Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

Table 53 – Disclosures in relation to specific circumstances

Legislation/Framework	E, S or G	Section	Page
EU Taxonomy FY25	E	The Group's transition plan for climate change mitigation	25
EU Emission Trading System	E	Quantitative and Qualitative Disclosures about Market Risk– Carbon Exposure and Hedging	43
UK Emission Trading Scheme	E	Quantitative and Qualitative Disclosures about Market Risk– Carbon Exposure and Hedging	43
Single European Sky	E	Actions and resources in relation to climate change policies	40
Carbon Offsetting and Reduction Scheme for International Aviation ("CORSIA")	E	Quantitative and Qualitative Disclosures about Market Risk– Carbon Exposure and Hedging	43
The Paris Agreement	E	The Group's transition plan for climate change mitigation	23
Fit for 55 (Including ReFuelEU)	E	Policies related to climate change mitigation and adaptation	32
(EU) 2018/1139	E	Policies related to pollution	46
<ul style="list-style-type: none"> • ISO 9001:2015 • ISO 14001:2015 • ISO 27001:2013 • ISO 45001:2018 • ISO 26000 	S	Safety & Security	53
ILO Declaration on Fundamental Principles and Rights at Work	S	Human and labor Rights	53
ILO Convention on Collective Bargaining	S	Human and labor Rights	53
ILO Convention on Discrimination	S	Human and labor Rights	53
Universal Declaration of Human Rights	S	Human and labor Rights	53
<ul style="list-style-type: none"> • ISO/IEC 27001 Information Security Management • PCI Data Security Standards • GDPR (General Data Protection Regulation) 	S	Information Security	65
Regulation (EC) No 261/2004 of the European Parliament and of the Council	S	Passenger rights	65
The Air Passenger Rights and Air Travel Organisers' Licensing (Amendment) (EU Exit) Regulations 2019	S	Passenger rights	65
Consumer Protection Act	S	Contact Centres	68
EU Whistleblowing Directive (2019/1937)	G	Whistleblowing	79

2. Methodologies

Environmental

Scope 1 Emissions

Basis for preparation: Scope 1 emissions are direct emissions from the combustion of jet fuel and gas use in the Group owned buildings from inside the organisational boundary.

Table 54 – Scope 1 emissions

Source	Boundary Description	Method	Emissions factors	Inputs
Mobile Consumption	The Group assets including leased aircraft	Emission factors applied to primary data	UK DEFRA Emission factors 2024	<ul style="list-style-type: none"> Jet Fuel invoices Aircraft onboard measurement equipment
Purchased Natural Gas	Consumption of gas in owned buildings including Head Office, Engineering, etc.	Emission factors applied to primary data	IEA Emission Factor (2024)	<ul style="list-style-type: none"> Utility bill/metered consumption

Scope 2 Emissions

Basis for preparation: Scope 2 emissions are indirect emissions from the generation of acquired and consumed electricity.

Table 55 – Scope 2 emissions

Source	Boundary Description	Method	Emissions factors	Inputs
Purchased electricity	Owned office space, leased office space, hangar facilities	Market based	Association of Issuing Bodies – European Residual Mixes 2021*	Utility bill/metered consumption
Purchased electricity	Owned office space, leased office space, hangar facilities	Location based	IEA Emission Factor (2024)	Utility bill/metered consumption

*The Residual Mix emission factors are based on Ecolnvent emission factors per technology and per country. Only direct emissions are considered. No life cycle analysis calculations are performed, and biogenic carbon emissions are not included either.



Scope 3 Emissions

Basis for preparation:

Table 56 – Scope 3 emissions

Source	Boundary Description	Method	Emissions factors	Inputs	Percentage of emissions calculated using data obtained from suppliers or value chain partners
Category 1: Purchased goods & services	The production, transportation and distribution of products purchased or acquired, including products sold on board by third party providers and the purchase of tyres	Hybrid & Average-data	UK DEFRA Emission factors 2024	<ul style="list-style-type: none"> Records of Tyres purchased in year Cater emissions identified relative to The Group services 	100%
Category 2: Capital goods	The production and transportation of aircraft	Supplier-Specific	Per manufacturer specific	<ul style="list-style-type: none"> Records of aircraft Purchases 	100%
Category 3: Fuel and energy related activities	The extraction, transport, refining and purification or conversion of primary fuels to jet kerosene and transportation and distribution losses	Average-data	UK DEFRA Emission factors 2024	<ul style="list-style-type: none"> Jet Fuel invoices Aircraft on board measurement equipment 	100%
Category 4: Upstream transportation and distribution	Emissions generated by Ground Traffic	Fuel-based	UK DEFRA Emission factors 2024	<ul style="list-style-type: none"> Fuel consumed per records associated with handling operations 	100%
Category 5: Waste generated in ops	The third-party transportation, disposal and treatment of waste generated on board aircraft	Waste-Type specific	UK DEFRA Emission factors 2024	<ul style="list-style-type: none"> Records of waste generated through operations 	100%
Category 6: Business travel	Hotel stays when employees travel for business	Spend-based	UK DEFRA Emission factors 2024	<ul style="list-style-type: none"> Length of Hotel stay per country 	0%
Category 7: Employee commuting	Air, rail, bus, automobile when employees commute between home and worksites	Average-data	UK DEFRA Emission factors 2024	<ul style="list-style-type: none"> Total employees, adjusted for those not commuting Mode of transport (rail, car, foot, bus) 	0%

Source	Boundary Description	Method	Emissions factors	Inputs	Percentage of emissions calculated using data obtained from suppliers or value chain partners
Category 8: Upstream leased assets	Consumption of gas in leased hangars	Asset-Specific & Average-Data	IEA Emission Factor (2024)	<ul style="list-style-type: none"> Based on consumption records Utility bill/metered consumption Based on consumption records 	100%
Category 9: Downstream transportation and distribution	The Group does not transport and distribute sold products in vehicles and facilities not owned or controlled by the Group				N/A
Category 10: Processing of sold products	The Group's primary sold products are flights, and emissions are accounted for in both our Scope 1 emissions and Scope 3 "Fuel-and-energy-related activities" categories. This category is not applicable for the Group				N/A
Category 11: Use of sold products	The use of fuel as part of car hire services sold on Group websites. Electricity consumed as part of hotel services sold on Group websites	Distance-based – car hire Average data – hotels	UK DEFRA Emission factors 2024	<ul style="list-style-type: none"> Distance travelled Vehicle type (passenger car) Length of Hotel stay per country 	98%
Category 12: End of life treatment of sold products	End of life emissions from disposing of aircraft is not applicable for the reporting period as the Group sold/retired no owned aircraft in FY25				N/A
Category 13: Downstream leased assets	The Group does not lease out any owned assets				N/A
Category 14: Franchises	The Group does not operate a franchise mode				N/A
Category 15: Investments	The Group has no relevant in scope investments				N/A

Social

Table 57 – Workforce related data for the year ended March 31, 2025, with reference to best practice, definitions under the CSRD and leveraging other, long established conventions.

CSRD Reference	Topic	Description	Assumption (if applicable)	Methodology
S1-6-50a	Number of Employees	The number of employees that are employed by the Group under the Categories "Employee" at year end.	All "Employee" and "Non-Employee" have a unique profile.	# of "Employees" as at year end (i.e., March 31).
S1-6-50a	Number of Employees by Gender	The gender of the "Employee"	N/A	# of "Employees" broken down by gender, as at year end (i.e March 31).
S1-6-50a	Number of Employees by Country	The country where the "Employee" is based for work	N/A	# of "Employees", broken down by country, as at year end (i.e., March 31).
S1-6-50b	Number of Employees by Contract Type	Permanent Temporary Non-Guaranteed Hours Full Time Part Time	N/A	# of "Employees" as at year end (i.e., March 31) by contract type, broken down by total, region and gender
S1-6-50c	Number of Employee Turnover	Aggregate of the number of employees who leave voluntarily or due to dismissal, retirement, or death in service	If the employee was marked on HR systems as leaving the period, the Group would identify for turnover calculation	# of "Employees" who left the Group as at year end (i.e March 31).
S1-6-50c	Percentage of Employee Turnover	Percentage of the number of employees who leave voluntarily or due to dismissal, retirement, or death in service vs the entire workforce	If the employee was marked on HR systems as leaving the period, the Group would identify for turnover calculation	# of "Employees" who left the Group in the period divided by total employees for the period x 100
S1-8-60a	Percentage of Total Employees covered by CLA	The percentage of employees that are employed by the Group under the Categories "Employee" that are covered by CLAs at year end.	N/A	# of employees covered by CBAs divided by Sum of Employees multiplied by 100
S1-8-60b and 60c	Percentage of Total Employees covered by CLA	The percentage of employees that are employed by the Group under the Categories "Employee" that are covered by CLAs at year end by country.	N/A	# of employees covered by CBAs divided by total Employees multiplied by 100 by country

CSRD Reference	Topic	Description	Assumption (if applicable)	Methodology
S1-8-63a	Percentage of employees covered by workers representatives	The percentage of employees that are employed by the Group under the Categories "Employee" that are covered by workers representatives.	N/A	# of employees covered by Worker's representatives divided by total Employees multiplied by 100 by country
S1-9-66a	Number of Employees at top management level	The number of "Employees" who are deemed to be top management of the Group.	N/A	# number of "Senior Management" listed in the Annual Report
S1-9-66a	Percentage of Employees at top management level	The percentage of "Employees" who are deemed to be top management of the Group	Top management is defined as including each Director, whether executive or otherwise, of the Group, as well as the Senior Management team reporting to the Board of Directors. Effectively key management personnel under IAS 24. Its already disclosed as this on page 223 of the Annual Report.	# of "Senior Management" listed in the Annual Report divided by sum of employees multiplied by 100
S1-9-66b	Number of Employees under 30 years of age	The number of employees under 30 years of age that are employed by the Group under the Category "Employee" at year end.	N/A	# of "Employees" under 30 years of age as at year end (i.e., March 31).
S1-9-66b	Percentage of Employees under 30 years of age	The percentage of employees under 30 years of age that are employed by the Group under the Category "Employee" at year end.	N/A	# of "Employees" under 30 years of age as at year end divided by total "Employees" multiplied by 100 (i.e March 31).
S1-9-66b	Number of Employees aged 30 – 50 years of age	The number of employees aged 30-50 years of age that are employed by the Group under the Category "Employee" at year end.	To avoid double counting with the previous data point, people aged 30 years and 1 day to be included here	# of "Employees" 30 - 50 years of age as at year end (i.e., March 31).
S1-9-66b	Percentage of Employees 30 – 50 years of age	The percentage of employees 30 – 50 years of age that are employed by the Group under the Category "Employee" at year end.	To avoid double counting with the previous data point, people aged 30 years and 1 day to be included here	# of "Employees" 30 - 50 age as at year end divided by sum of "Employees" multiplied by 100 (i.e March 31).
S1-9-66b	Number of Employees over 50 years of age	The number of employees over 50 years of age that are employed by the Group under the Category "Employee" at year end.	To avoid double counting with the previous data point, people aged 50 years and 1 day to be included here	# of "Employees" over 50 years of age as at year end (i.e., March 31).
S1-9-66b	Percentage of Employees over 50 years of age	The percentage of employees over 50 years of age that are employed by the Group under the Category "Employee" at year end.	To avoid double counting with the previous data point, people aged 50 years and 1 day to be included here	# of "Employees" over 50 ages as at year end divided by sum of "Employees" multiplied by 100 (i.e., March 31).

CSRD Reference	Topic	Description	Assumption (if applicable)	Methodology
S1-14-88a	Percentage of Employees who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines	Percentage of Employees who are covered by health and safety management system.	N/A	# of employees subject to health and safety management divided by # of total employees
S1-14-88b	Number of fatalities of Employees as result of work-related injuries and work-related ill health	Number of "Employees" who died as a result of work related accident or work related ill health.	Receipt of medical confirmation that ill health / injury was work related.	# of "Employees" who died as a result of work related accident or work related ill health
S1-14-88b	Number of fatalities of other workers working on undertaking's sites as a result of work-related injuries and work-related ill health	Number of "Value Chain" workers who died as a result of work related accident or work related ill health.	Work-related injury or ill health that results in any of the following: i. death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness; or ii. significant injury or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness"	# of "Value Chain" workers who died as a result of work related accident or work related ill health
S1-14-88c	Number of recordable work-related accidents of Employees	Number of "Employees" work related accidents	Group safety management system records all accidents. Listing is reviewed to identify which accidents deemed 'work-related'.	# of "Employees" work related accidents
S1-14-88c	Rate of recordable work-related accidents of employees	Number of Work-related accidents for "Employees" per 1,000 workers	N/A	#of Work related accidents for "Employees" divided by the total number of hours in own workforce and multiplied by 1,000,000
S1-14-90	Percentage of own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines and which has been internally audited and (or) audited or certified by external party	Includes "Employees" and "Non-Employees"	N/A	# of own workforce subject to health and safety management divided by # of total own workforce

CSRD Reference	Topic	Description	Assumption (if applicable)	Methodology
S1-16-97a	Gender Pay Gap	The difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees.	Data underlying metrics is for Ryanair DAC only with a preparation date of end June. This accounts for c.65% of the overall workforce i.e. 17,000 employees were included in the 2024 report. The Group is satisfied that the employees within Ryanair DAC are representative of the overall workforce of the Group. Employees not captured in the report (in Malta Air and Lauda) are primarily pilots and cabin crew which also make up a large % of the Ryanair DAC workforce.	Average gross hourly pay level of male employees less average gross hourly pay level of female employees divided by the average gross hourly pay level of male employees multiplied by 100
S1-16-97b	Annual Total Remuneration ratio	Ratio of the highest paid individual to the median annual total remuneration for DAC employees (excluding the highest-paid individual).	Median pay data assumption as per S1-16-97a.	Annual total remuneration for Group CEO (highest paid individual) divided by the median employee annual total remuneration (excluding the Group CEO)
S1-17-103a	Number of incidents of discrimination.	"Employee" and "Non-Employee" work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This includes incidents of harassment as a specific form of discrimination.	Sum of work-related incidents of discrimination impact "Employee" and "Non-Employee"	# of all identified incidents of discrimination
S1-17-103b	Number of complaints filed through channels for people in own workforce to raise concerns.	"Employee" and "Non-Employee" work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This includes incidents of harassment as a specific form of discrimination.	N/A	# of work related incidents of discrimination impact "Employees" and "Non-Employees" through internal channels

CSRD Reference	Topic	Description	Assumption (if applicable)	Methodology
S1-17-103b	Number of complaints filed to National Contact Points for OECD Multinational Enterprises.	"Employee" and "Non-Employee" work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This includes incidents of harassment as a specific form of discrimination.	N/A	# of work related incidents of discrimination impact "Employees" and "non-Employees" reported to the Group through National Contact Points for OECD Multinational Enterprises
S1-17-103c	Amount of fines, penalties, and compensation for damages as result of violations regarding social and human rights factors.	"Employee" and "Non-Employee" work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This includes incidents of harassment as a specific form of discrimination.	N/A	Sum of all material fines, penalties, and compensation for damages awarded as result of violations regarding social and human rights factors
S1-17-104a	Number of severe human rights issues and incidents connected to own workforce.	"Employee" and "Non-Employee" incidents of forced labor, human trafficking and/or child labor.	N/A	# of severe human rights issues
S1-17-104a	Number of severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	"Employee" and "Non-Employee" incidents of forced labor, human trafficking and/or child labor.	N/A	# of severe human rights issues which are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises
S1-17-104b	Amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce	"Employee" and "Non-Employee" incidents of forced labor, human trafficking and/or child labor.	N/A	Sum of all material fines, penalties, and compensation awarded for severe human rights issues and incidents connected to own workforce
S1-17-104	Number of severe human rights cases where undertaking played role securing remedy for those affected	"Employee" and "Non-Employee" incidents of forced labor, human trafficking and/or child labor.	N/A	# of severe human rights issues where Ryanair securing remedy
S4-55-38	CSAT scoring	Customer satisfaction score	N/A	% respondents giving a positive rating based on a post flight survey

Governance

Table 58 – Governance related data – methodologies and assumptions

CSRD Reference	Topic	Description	Assumption (if applicable)	Methodology
G1-3-21b	Percentage of functions-at-risk covered by training programs	Group requires prescribed persons to undertake Governance training when requested.	People managers, as well as all members of the Finance, Commercial, Legal and HR departments are all defined as at risk – all are required to complete the ABAC training	Report identifies all prescribed persons and an extract from the training systems confirms whether training has been completed.
G1-4-24a	Number of convictions for violation of anti-corruption and anti-bribery laws	Assessment of convictions by the Group that relate to ABAC violations.	N/A	# of all fines incurred by the Group that relate to ABAC violations.
G1-4-24a	Amount of fines for violation of anti-corruption and anti-bribery laws	Assessment of fines incurred by the Group that relate to ABAC violations.	N/A	Sum of the EUR equiv. of all fines incurred by the Group that relate to ABAC violations.
G1-6-33a	Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated	All Group entity payments are reviewed to compare the actual payment date against the date the invoice was received.	N/A	Report identifies all third-party payments in the year noting both the due date and the receipt of the invoice.
G1-6-33b	Percentage of payments aligned with standard payment terms	Review of actual payment terms against contractual terms for all Group entity payments.	Payment terms are linked to those agreed in the contract.	# of payments outside of agreed payment terms divided by total number of payments.
G1-6-33c	Number of outstanding legal proceedings for late payments	Assessment of all legal proceedings against the Group to identify any related to late payments.	N/A	# of any legal proceeding identified as related to late payment

Level of Accuracy

Emissions data presented is subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data. The selection of different but acceptable measurement techniques can result in materially different measurements. The precision of different measurement techniques may also vary. The Group does not consider this data to be subject to a high level of measurement uncertainty.

3. DMA Methodology

Scoring

Impact Materiality:

Likelihood of an impact is assessed in the case of potential impacts only i.e., not for actual impacts.

Impact Materiality = Scale of impacts + Scope of impacts + remediability (*Likelihood)

Scale: How serious is the negative impact or how beneficial is the positive impact on people or the environment.

Scope: How widespread the negative or positive impacts are. In the case of environmental impacts, the scope may be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on people, the scope may be understood as the number of people adversely affected.

Remediability: Whether and to what extent the negative impacts could be remediated i.e. restoring the environment or affected people to their prior state.

Scale, scope and remediability are the components of severity. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood.

Likelihood (only for potential impacts): The likelihood of the impact of the event.

*An impact is assessed as material if it reaches the threshold of 8. The topic is determined to be “important” and thus subject to mandatory reporting.

Table 59 – Impact

Scale of Impact	
0 = none	5 = absolute
Scope of Impact	
0 = none	5 = global/total
Remediability of Impact	
0 = very easy to remediate	5 = not remediable, irreversible
Likelihood	
Rating	Multiplying Factor
1 = unlikely (<25%)	60%
2 = rather unlikely (>25%)	70%
3 = Likely (>50%)	85%
4 = very likely (>75%)	100%

Table 60 – Impact Materiality

(12, 15)	Critical
(10, 12)	Significant
(8, 10)	Important
(5, 8)	Informative
<5	Minimal

A threshold score of 8 out of 15 across the three severity categories accurately captures impacts that have a high scale, high scope and low remediability.

Financial Materiality:

Financial Materiality = Magnitude * Likelihood

A sustainability matter is material from a financial point of view if it causes or can reasonably be expected to cause material financial effects for the company in the short, medium, long-term.

A Sustainability Matter is material if it reaches the threshold score of 2, meaning from a financial perspective if it triggers or may trigger material financial effects on the undertaking. This is the case when it generates, or may generate, risks or opportunities that have a material influence (or are likely to have a material influence) on the undertaking's cash flows, development, performance, position, cost of capital or access to finance in the short, medium, and long-term time horizons.

A risk or opportunity is assessed as material if it reaches the threshold of 2. The topic is determined subject to mandatory reporting.

Table 61 – Thresholds

Magnitude	
0 = none	5 = absolute
Likelihood	
Rating	Multiplying Factor
1 = unlikely (<25%)	60%
2 = rather unlikely (>25%)	70%
3 = Likely (>50%)	85%
4 = very likely (>75%)	100%
Financial Materiality	
5	Critical
4	Significant
3	Important
2	Informative
1	Minimal

A threshold score of 2 out of 5 across the two categories accurately captures risks and opportunities that have a high magnitude and a high likelihood.

4. Disclosure requirements and incorporation by reference

Disclosures located outside of the sustainability statement and indicated by the symbol * are subject to limited assurance and covered by the sustainability assurance opinion.

Table 62 – Incorporation by reference

Cross-cutting standards		Paragraph	Section in the Annual Report	Page in the Annual Report
GOV-1	The role of the administrative, management and supervisory bodies	21a	Membership	17
		21b	Workforce	30
		21c	Summary of Director Competencies	19
		21d	Diversity	23
		21e	Membership	17
		23a	Summary of Director Competencies	19
GOV-3	Integration of sustainability-related performance in incentive schemes	29a	Remuneration policy (2023)	144
		29b	Remuneration policy (2023)	144
		29c	Remuneration policy (2023)	144
		29d	Remuneration policy (2023)	144
		29e	Remuneration policy (2023)	144
GOV-5	Risk management and internal controls over sustainability reporting	36	Risk Management & Internal Control	32
SBM-1	Strategy, business model and value chain	40a i	Introduction	184
		40a ii	Introduction	184
		42a	Strategy	185-186
		42b	Strategy	185-186
E1-GOV-3	Integration of sustainability-related performance in incentive schemes	13	Remuneration policy (2023)	144
G1 – GOV -1	The role of the administrative, management and supervisory bodies	5b	Summary of Director Competencies	19

5. Phased-in provisions available in accordance with ESRS 1 Appendix C

Table 63 – Phased-in provisions available in accordance with ESRS 1 Appendix C

ESRS	Disclosure Requirement	Description
ESRS 2 – SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	The undertaking may omit the information prescribed by ESRS 2 SBM-3 paragraph 48(e) (anticipated financial effects) for the first year of preparation of its Sustainability Statement. The undertaking may comply with ESRS 2 SBM-3 paragraph 48(e) by reporting only qualitative disclosures for the first 3 years of preparation of its Sustainability Statement, if it is impracticable to prepare quantitative disclosures.
ESRS 2 – SBM-1	Strategy, business model and value chain	The undertaking shall report the information prescribed by ESRS 2 SBM-1 paragraph 40(b) (breakdown of total revenue by significant ESRS sector) and 40(c) (list of additional significant ESRS sectors) starting from the application date specified in a Commission Delegated Act to be adopted pursuant to article 29b(1) third subparagraph, point (ii), of Directive 2013/34/EU.
ESRS E1 – E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	The undertaking may omit the information prescribed by ESRS E1-9 for the first year of preparation of its Sustainability Statement. The undertaking may comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of its Sustainability Statement, if it is impracticable to prepare quantitative disclosures.
ESRS E5 – E5-6	Anticipated financial effects from resource use and circular economy-related risks and opportunities	The undertaking may omit the information prescribed by ESRS E5-6 for the first year of preparation of its Sustainability Statement. The undertaking may comply with ESRS E5-6 by reporting only qualitative disclosures, for the first 3 years of preparation of its Sustainability Statement.
ESRS S1 – S1-7	Characteristics of non-employee workers in the undertaking's own workforce	The undertaking may omit reporting for all datapoints in this Disclosure Requirement for the first year of preparation of its Sustainability Statement.
ESRS S1 – S1-8	Collective bargaining coverage and social dialogue	The undertaking may omit this Disclosure Requirement with regard to its own employees in non-EEA countries for the first year of preparation of its Sustainability Statement.
ESRS S1 – S1-11	Social protection	The undertaking may omit the information prescribed by ESRS S1-11 for the first year of preparation of its Sustainability Statement.
ESRS S1 – S1-12	Persons with disabilities	The undertaking may omit the information prescribed by ESRS S1-12 for the first year of preparation of its Sustainability Statement.
ESRS S1 – S1-13	Training and skills development	The undertaking may omit the information prescribed by ESRS S1-13 for the first year of preparation of its Sustainability Statement.
ESRS S1 – S1-14	Health and safety	The undertaking may omit the data points on cases of work-related ill-health and on number of days lost to injuries, accidents, fatalities and work-related ill health for the first year of preparation of its sustainability statement. The undertaking may omit reporting on non-employees for the first year of preparation of its Sustainability Statement.
ESRS S1 – S1-15	Work-life balance	The undertaking may omit the information prescribed by ESRS S1-15 for the first year of preparation of its Sustainability Statement.

6. List of abbreviations

Table 64 – List of abbreviations

ABAC	Anti-Bribery & Anti-Corruption
AP	Accounts Payable
CBCE	Code of Business Conduct & Ethics
CSRD	Corporate Sustainability Reporting Directive
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
CLAs	Collective Labor Agreements
DMA	Double Materiality Assessment
ESRS	European Sustainability Reporting Standards
ERM	Enterprise Risk Management
EFRAG	European Financial Reporting Advisory Group
ETS	Emissions Trading System
EU	European Union
ERCs	Employee Relations Committees
EWCs	European Works Councils
GHG	Greenhouse gases
GDPR	General Data Protection Regulation
IROs	Impacts, Risks and Opportunities
ILO	International Labor Organization
ICAO	International Civil Aviation Organisation
MRV	Monitoring, Reporting and Verification
NZE	Net Zero Emissions
RED	Renewable Energy Directive
SAF	Sustainable Aviation Fuel
SBTi	Science Based Targets initiative
SDGs	Sustainable Development Goals
SMS	Safety Management System
TCFD	Task Force on Climate-related Financial Disclosures
VPPA	Vital Power Purchasing Agreements
VCS	Verified Carbon Standard
VTO	Voluntary time off

7. Disclosure Requirements in ESRs covered by the undertaking's Sustainability Statement

Table 65 – Datapoints that derive from other EU legislation below includes all of the datapoints that derive from other EU legislation as listed in ESRs 2 Appendix B, indicating where the data points can be found in the report and which data points are assessed as “Not material”.

Table 65 – Datapoints that derive from other EU legislation.

Disclosure Requirement	Data Point	Sustainability Statements Appendix	SFDR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Section	Page
ESRS 2 GOV-1	21 (d)	Board's gender diversity	X		X		Governance	23 AR
ESRS 2 GOV-1	21 (e)	Percentage of Board members who are independent			X		Governance	21 AR
ESRS 2 GOV-4	30	Statement on due diligence	X				Statement on sustainability due diligence	21
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	X	X	X		Not material	N/A
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	X		X		Not material	N/A
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	X		X		Not material	N/A
ESRS 2 SBM-1	40 (d) iv	Involvement in the activities related to the production of tobacco			X		Not material	N/A
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				X	The Group's transition plan for climate change mitigation	23
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks		X	X		The Group's transition plan for climate change mitigation	23
ESRS E1-4	34	GHG emission reduction targets	X	X	X		Table 16 - The Group's GHG emission targets	36
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	X				Table 18- The Group's Energy Consumption Mix	40
ESRS E1-5	37	Energy consumption and mix	X				Table 18- The Group's Energy Consumption Mix	40

Disclosure Requirement	Data Point	Sustainability Statements Appendix	SFDR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Section	Page
ESRS E1-5	40-43	Energy associated with activities in high climate impact sectors	X				Table 19 – The Group's net revenue in relation to taxonomy revenue	41
ESRS E1-6	44	Gross Scope 1,2, and total GHG emissions	X	X	X		Table 20 – Carbon dioxide equivalent (CO ₂ e) of the Group's operations	42
ESRS E1-6	53-55	Gross GHG emissions intensity	X	X	X		Gross Scopes 1, 2, 3 and total GHG emissions	42
ESRS E1-7	56	GHG removals and carbon credits				X	GHG removals and GHG mitigation projects financed through carbon credits	43
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			X		Not relevant in the first 3 years.	N/A
ESRS E1-9	66 (a) 66 (c)	Disaggregation of monetary amounts by acute and chronic physical risk Location of significant assets at material physical risk		X			Not relevant in the first 3 years.	N/A
ESRS1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		X			Not relevant in the first 3 years.	N/A
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			X		Not relevant in the first 3 years.	N/A
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water, and soil	X				Air pollutants	46
ESRS E3-1	9	Water and marine resources	X				Not material	N/A
ESRS E3-1	13	Dedicated policy	X				Not material	N/A
ESRS E3-1	14	Sustainable oceans and seas	X				Not material	N/A
ESRS E3-4	28 (c)	Total water recycled and reused	X				Not material	N/A

Disclosure Requirement	Data Point	Sustainability Statements Appendix	SFDR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Section	Page
ESRS E3-4	29	Total water consumption in m3 per net revenue on own operations	X				Not material	N/A
ESRS 2-IRO 1-E4	16 (a) i		X				Not material	N/A
ESRS 2-IRO 1-E4	16 (b)		X				Not material	N/A
ESRS 2-IRO 1-E4	16 (c)		X				Not material	N/A
ESRS E4-2	24 (b)	Sustainable land / agriculture practices or policies	X				Not material	N/A
ESRS E4-2	24 (c)	Sustainable oceans / seas practices or policies	X				Not material	N/A
ESRS E4-2	24 (d)	Policies to address deforestation	X				Not material	N/A
ESRS E5-5	37 (d)	Non-recycled waste	X				Not material	N/A
ESRS E5-5	39	Hazardous waste and radioactive waste	X				Not material	N/A
ESRS 2-SBM3 – S1	14 (f)	Risk of incidents of forced labor paragraph	X				Material IROs and their interaction with the Group's strategy and business model	51
ESRS 2-SBM3 – S1	14 (g)	Risk of incidents of child labor	X				Material IROs and their interaction with the Group's strategy and business model	51
ESRS S1-1	20	Human Rights policy commitments	X				Table 31- Policies related to Own Workforce	52
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			X		Table 31- Policies related to Own Workforce	52
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	X				Table 31- Policies related to Own Workforce	52
ESRS S1-1	23	Workplace accident prevention policy or management system	X				Table 31- Policies related to Own Workforce	52

Disclosure Requirement	Data Point	Sustainability Statements Appendix	SFDR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Section	Page
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	X				Remediation and channels to raise concerns	54
ESRS S1-14	88 (b) and (c)	Number of fatalities and number and rate of work-related accidents	X		X		Table 39 - Health and Safety Coverage metrics	62
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities, or illness	X				Not relevant in the year 1	N/A
ESRS S1-16	97 (a)	Unadjusted gender pay gap	X		X		Remuneration metrics	62
ESRS S1-16	97 (b)	Annual total remuneration ratio	X				Remuneration metrics	62
ESRS S1-17	103 (a)	Incidents of discrimination	X				Table 40 - Incidents, complaints and severe human rights impacts	62
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	X		X		Table 40 - Incidents, complaints and severe human rights impacts	62
ESRS 2-SBM3 – S2	11(b)	Significant risk of child labor or forced labor in the value chain	X				Not material	N/A
ESRS S2-1	17	Human Rights policy commitments	X				Not material	N/A
ESRS S2-1	18	Policies related to value chain workers	X				Not material	N/A
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	X		X		Not material	N/A
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			X		Not material	N/A
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	X				Not material	N/A
ESRS S3-1	16	Human rights policy commitments	X				Not material	N/A

Disclosure Requirement	Data Point	Sustainability Statements Appendix	SFDR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Section	Page
ESRS S3-4	16	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	X		X		Not material	N/A
ESRS S3-4	36	Human rights issues and incidents	X				Not material	N/A
ESRS S4-1	16	Policies related to consumers and end-users	X				Table 42 - Policies related to Consumers and End-Users	65
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	X				Table 42 - Policies related to Consumers and End-Users	65
ESRS S4-4	35	Human rights issues and incidents	X				Table 42 - Policies related to Consumers and End-Users	65
ESRS G1-1	10 (b)	United Nations Convention against Corruption	X				Table 48 – Actions related to Business Conduct	78
ESRS G1-1	10 (d)	Protection of whistleblowers	X				Table 49 – Actions to protect whistleblowers	79
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery	X		X		Table 48 – Actions related to Business Conduct	78
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	X				Table 48 – Actions related to Business Conduct	78

Table 66 - Disclosure Requirements included in Sustainability Statement and the topics omitted as 'Not Material' includes all the Disclosure requirements complied with in the Sustainability Statement and the topics that have been omitted as not material:

Table 66 – Disclosure Requirements included in Sustainability Statement and the topics omitted as 'Not Material'

Standard	Disclosure Requirement	Material/Not material	Page
ESRS 2			
BP-1	General basis for preparation of Sustainability Statements	Material	3
BP-2	Disclosures in relation to specific circumstances	Material	3
GOV-1	The role of the administrative, management and supervisory bodies	Material	18
G1 – GOV-1	The role of the administrative, supervisory and management bodies	Material	18
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Material	20
GOV-3	Integration of sustainability-related performance in incentive schemes	Material	20
GOV-4	Statement on due diligence	Material	21
GOV-5	Risk management and internal controls over sustainability reporting	Material	21
SBM-1	Strategy, business model and value chain	Material	13
SBM-2	Interests and views of stakeholders	Material	16
S1-SBM-2	Interests and views of stakeholders	Material	16
S4-SBM-2	Interests and views of stakeholders	Material	16
SBM-3	Material IROs and our interaction with strategy and business model	Material	23
			51; 64
IRO-1	Description of the processes to identify and assess material IROs	Material	4
E1-IRO-1	Description of the processes to identify and assess material IROs	Material	4
E2-IRO-1	Description of the processes to identify and assess material IROs	Material	4
E3-IRO-1	Description of the processes to identify and assess material IROs	Material	4
E4-IRO-1	Description of the processes to identify and assess material IROs	Material	4
E5-IRO-1	Description of the processes to identify and assess material IROs	Material	4
G1-IRO-1	Description of the processes to identify and assess material IROs	Material	4
IRO-2	Disclosure requirements in ESRS covered by the undertaking's Sustainability Statement	Material	96
ESRS E1 – Climate change			
E1- GOV-3	Integration of sustainability-related performance in incentive schemes	Material	20
E1-1	Transition plan for climate change mitigation	Material	23

Standard	Disclosure Requirement		Material/Not material	Page
ESRS E1 – Climate change (continued)				
ESRS 2 SBM-3	Material IROs and our interaction with strategy and business model		Material	23
E1-2	Policies related to climate change mitigation and adaptation		Material	32
E1-3	Actions and resources in relation to climate change policies		Material	33
E1-4	Targets related to climate change mitigation and adaptation		Material	35
E1-5	Energy consumption and mix		Material	40
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions		Material	42
E1-6	Net revenue, Net revenue used to calculate GHG intensity, Net revenue (other), Total net revenue (in financial statements)		Material	41
E1-7	GHG removals and GHG mitigation projects financed through carbon credits		Material	44
E1-8	Internal carbon pricing		Material	45
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities		1/3-year phase-in	N/A
ESRS E2 – Pollution				
E2-1	Policies related to pollution		Material	46
E2-2	Actions and resources in relation to pollution		Material	46
E2-3	Targets related to pollution		Material	46
E2-4	Pollution of air, water and soil		Material	46
E2-5	Substances of concern and substances of very high concern		Not material	N/A
E2-6	Anticipated financial effects from material pollution-related risks and opportunities		Not material	N/A
ESRS E5 – Resource use and circular economy				
E5-1	Policies related to resource use and circular economy		Material	48
E5-2	Actions and resources in relation to resource use and circular economy		Material	48
E5-3	Targets related to resource use and circular economy		Material	48
E5-4	Resource inflows		Material	48
E5-5	Resource outflows		Not material	N/A
E5-6	Anticipated financial effects from resource use and circular economy-related IROs		1/3-year phase-in	N/A

Standard	Disclosure Requirement	Material/Not material	Page
ESRS S1 – Own workforce			
ESRS 2 SBM-3	Material IROs and our interaction with strategy and business model	Material	51
S1-1	Policies related to own workforce	Material	52
S1-2	Processes for engaging with own workers and workers' representatives about impacts	Material	53
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Material	54
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Material	55
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Material	59
S1-6	Characteristics of the undertaking's employees	Material	59
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	1 year phase-in	N/A
S1-8	Collective bargaining coverage and social dialogue	1 year phase in for non-EEA countries	61
S1-9	Diversity metrics	Material	61
S1-10	Adequate wages	Material	61
S1-11	Social protection	1 year phase-in	N/A
S1-12	Persons with disabilities	1 year phase-in	N/A
S1-13	Training and skills development metrics	1 year phase-in	N/A
S1-14	Health and safety metrics	Material / 1 year phase-in	62
S1-15	Work-life balance metrics	1 year phase-in	N/A
S1-16	Compensation metrics (pay gap and total compensation)	Material	62
S1-17	Incidents, complaints and severe human rights impacts	Material	62
ESRS S4 – Consumers and end-users			
ESRS 2 SBM-3	Material IROs and our interaction with strategy and business model	Material	64
S4-1	Policies related to consumers and end-users	Material	65
S4-2	Processes for engaging with consumers and end-users about impacts	Material	67
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Material	68
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Material	69
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Material	73

Standard	Disclosure Requirement	Material/Not material	Page
ESRS G1 - Governance			
G1-1	Corporate culture and business conduct policies and corporate culture	Material	74
G1-2	Management of relationships with suppliers	Material	80
G1-3	Prevention and detection of corruption and bribery	Material	77
G1-4	Confirmed incidents of corruption or bribery	Material	82
G1-5	Political influence and lobbying activities	Not material	N/A
G1-6	Payment practices	Material	82

For information of how the Group has determined the material information to be disclosed in relation to the IROs, please refer to the “Double Materiality Assessment” section on page 4.



INDEPENDENT PRACTITIONERS' LIMITED ASSURANCE REPORT ON RYANAIR HOLDINGS PLC'S SUSTAINABILITY STATEMENT

To the Directors of Ryanair Holdings plc

Limited assurance conclusion

We have conducted a limited assurance engagement on the consolidated Sustainability Statement of Ryanair Holdings plc ("the Group"), included in pages 36 to 140 of the Directors' Report (the "Sustainability Statement"), as at 31 March 2025 and for the year then ended, prepared in accordance with Part 28 of the Companies Act 2014.

Certain required disclosures have been presented elsewhere in the Annual Report, rather than in the Sustainability Statement. These are cross referenced from the Sustainability Statement and are identified as subject to limited assurance.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Sustainability Statement is not prepared, in all material respects, in accordance with Part 28 of the Companies Act 2014, including:

- compliance of the sustainability reporting with the European Sustainability Reporting Standards ("ESRS");
- the process carried out by the Group to identify the information reported pursuant to the sustainability reporting standards, is in accordance with the description set out in the 'Basis of Preparation' section of the Sustainability Statement; and
- compliance of the disclosures in the 'Consolidated Disclosures Pursuant to Article 8 Taxonomy Regulation' subsection within the 'ESRS E1 – Climate Change' section of the Sustainability Statement with Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation").

Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (Ireland) 3000, Assurance engagements other than audits or reviews of historical financial information - assurance of sustainability reporting in Ireland ("ISAE (Ireland) 3000"), issued by the Irish Auditing & Accounting Supervisory Authority (IAASA). The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Practitioners' responsibilities section of our report.

Our independence and quality management

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standard Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour and the independence requirements of the Companies Act 2014 and the Code of Ethics issued by Chartered Accountants Ireland that are relevant to our limited assurance engagement of the Sustainability Statement in Ireland.

The firm applies International Standard on Quality Management (Ireland) 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Directors' responsibilities for the Sustainability Statement

As explained more fully in the Statement of Directors' Responsibilities in respect of the Sustainability Statement as set out on page 154 of the Annual Report, the Directors of the Group are responsible for designing and implementing a process to identify the information reported in the Sustainability Statement in accordance with the ESRS and for disclosing this Process in the 'Basis of Preparation' section of the Sustainability Statement. This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

The Directors of the Group are further responsible for the preparation of the Sustainability Statement, in accordance with Part 28 of the Companies Act 2014, including:

- compliance with the ESRS;
- preparing the disclosures in the 'Consolidated Disclosures Pursuant to Article 8 Taxonomy Regulation' subsection within the 'ESRS E1 – Climate Change' section of the Sustainability Statement, in compliance with the Taxonomy Regulation;
- designing, implementing and maintaining such internal control that the Directors determine is necessary to enable the preparation of the Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Inherent limitations in preparing the Sustainability Statement

In reporting forward-looking information in accordance with ESRS, the Directors of the Group are required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected.

Practitioners' responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the Sustainability Statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE (Ireland) 3000 we exercise professional judgement and maintain professional scepticism throughout the engagement. Our responsibilities in respect of the Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- Considering whether the information identified addresses the applicable disclosure requirements of the ESRS; and
- Designing and performing procedures to evaluate whether the Process is consistent with the Group's description of its Process set out in the 'Basis of Preparation' section of the Sustainability Statement.

Our other responsibilities in respect of the Sustainability Statement include:

- Identifying where material misstatements are likely to arise, whether due to fraud or error; and
- Designing and performing procedures responsive to where material misstatements are likely to arise in the Sustainability Statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability Statement. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise in the Sustainability Statement, whether due to fraud or error.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
 - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, climate scenario analysis, climate transition plan, business strategy and plans); and
 - reviewing the Group's internal documentation of its Process.
- Evaluated whether the evidence obtained from our procedures with respect to the Process implemented by the Group was consistent with the description of the Process set out in the 'Basis of Preparation' section of the Sustainability Statement.

In conducting our limited assurance engagement, with respect to the Sustainability Statement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its Sustainability Statement by obtaining an understanding of the Group's control environment, processes and information systems relevant to the preparation of the Sustainability Statement, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control;
- Evaluated whether the information identified by the Process is included in the Sustainability Statement;
- Evaluated whether the structure and the presentation of the Sustainability Statement is in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected information in the Sustainability Statement;
- Performed substantive assurance procedures to limited assurance on selected information in the Sustainability Statement;
- Where applicable, compared disclosures in the Sustainability Statement with the corresponding disclosures in the Consolidated Financial Statements and Directors' Report;
- Evaluated the methods, assumptions and data for developing estimates and forward-looking information;
- Obtained an understanding of the Group's process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Sustainability Statement, and
- Performed substantive assurance procedures to limited assurance on selected information with respect to the EU taxonomy disclosures.

Other Matter - Compliance with the requirement to mark-up the Sustainability Statement

Section 1613(3)(c) of the Companies Act 2014 requires us to report on the compliance by the Group with the requirement to mark-up the Sustainability Statement in accordance with Section 1600 of that Act. Section 1600 of the Companies Act 2014 requires that the Directors' Report is prepared in the electronic reporting format specified in Article 3 of Delegated Regulation (EU) 2019/815 and shall mark-up the Sustainability Statement. However, at the time of issuing our limited assurance report, the electronic reporting format has not been specified nor become effective by Delegated Regulation. Consequently, the Group is not required to mark-up the Sustainability Statement. Our conclusion is not modified in respect of this matter.

Other Matter - References to external sources or websites

The references to external sources or websites in the Sustainability Statement are not part of the Sustainability Statement and therefore are not within the scope of our limited assurance engagement.

Other Matter- Comparative Information

The comparative information included in the Sustainability Statement of the Group as at 31 March 2024 and for the year then ended was not subject to an assurance engagement. Our conclusion is not modified in respect of this matter.

Use of this report

Our report is made solely in accordance with Section 1613 of the Companies Act 2014 to the Directors of Ryanair Holdings plc.

Our assurance work has been undertaken so that we might state to the Directors those matters we are required to state to them in a limited assurance report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than Ryanair Holdings plc and its Directors, as a body, for our limited assurance work, for this report, or for the conclusions we have formed.

Paul O'Connor
for and on behalf of PricewaterhouseCoopers
Chartered Accountants and Statutory Audit Firm
Dublin
May 16, 2025

RYANAIR GROUP

WHAT MAKES RYANAIR ONE OF EUROPE'S MOST EFFICIENT AIRLINES?



YOUNG FLEET +



HIGH LOAD FACTORS +



FLYING DIRECT
ROUTES

=



LOWER EMISSIONS

MSCI



A



SUSTAINALYTICS

NO.1
GLOBAL
LARGE CAP
AIRLINE



A-

CSAT

86%

RYANAIR TARGETS A 27% REDUCTION OF CO2 PER PAX/KM BY 2031.

