



August 15, 2019

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction**

Welcome to the WestJet Group's slavery and human trafficking statement. Our statement outlines the steps we have taken to prevent modern slavery within the WestJet Group and our supply chains and sets out our plans for future improvements. The *UK Modern Slavery Act* (the "Act") is welcomed by the WestJet Group and has prompted us to undertake a thorough review of our policies.

Please feel free to contact us at [legal@westjet.com](mailto:legal@westjet.com) with any comments, queries, or suggestions regarding our statement.

### **Statement**

The WestJet Group ("WestJet") condemns all forms of modern slavery, including human trafficking and sexual exploitation. WestJet fully supports and respects the principles set forth in various modern slavery and anti-human trafficking laws, which are consistent with our commitment and our Mission to enrich the lives of everyone in WestJet's world. We take our responsibility seriously and will continue to take action to mitigate the risks of human trafficking in our operations and with our business partners.

### **About WestJet**

Together with WestJet's regional airline, WestJet Encore, we offer scheduled service to more than 100 destinations in North America, Central America, the Caribbean and Europe and to more than 175 destinations in over 20 countries through our airline partnerships. WestJet Vacations offers affordable, flexible vacations to more than 60 destinations and the choice of more than 800 hotels, resorts, condos and villas.

In addition, Swoop is Canada's leading ultra-low-cost airline, independently operated, offering point-to-point scheduled service to destinations in Canada, the U.S., Mexico and the Caribbean.

### **Guiding Principles and Documents**

We embody our culture of caring and teamwork, using our Mission and WestJet's Code of Business Conduct (the "Code") as our primary guides. The Code defines how we conduct business around the world. It includes sections related to:

- "Our responsibility to report what doesn't seem right";
- "Our responsibility to our business partners and others"; and
- "Our responsibility to our guests and the public".

Other relevant policies to assist with mitigating this risk include the WestJet Confidential and Anonymous Reporting Hotline Policy and Procedure and the Procurement Policy.

Together, these principles and documents describe the standards of business conduct and key compliance policies that apply to our interactions with each other as employees, guests, and our business partners around the world. These policies help ensure that we conduct business in an ethical and responsible manner and that human trafficking and modern slavery do not occur within WestJet.

WestJet expects all employees to be treated with respect. We have put in place various employee programs to assist with wellbeing, including the employee and family assistance program (EFAP) and the Respect in the Workplace Policy.

WestJet's supply chain management professionals operate at a level befitting a global airline, following rigorous internal material standards for sourcing, procurement and selection of our suppliers and business partners. Our Procurement Policy defines how we choose suppliers, and our individual business units are responsible to ensure that suppliers are operating to our standards. We follow this process to eliminate any potential negative impacts of our global supply chain.

Under the Confidential and Anonymous Reporting Hotline Policy and Procedure, we have provided anyone with the ability to anonymously report any concerns about any wrongdoing or breaches of law. They are encouraged to raise them through numerous channels, including in confidence and without fear of disciplinary action or retaliation, through this policy.

### **Commitment to Combat Modern Slavery**

WestJet gives life to our commitment to combat modern slavery through our policies and the direct and strategic support of leadership. WestJet does not tolerate any employee or contractor activities that cause or further human trafficking violations or sexual exploitation. WestJet prohibits the use of company facilities, resources, equipment or travel privileges for activities that support human trafficking or sexual exploitation. This includes any use of company computers, networks, phones or other equipment for the viewing, storage, distribution, promotion or other use that sexually exploits any individuals. Employees or contractors who participate in human trafficking activities or the sexual exploitation of anyone will be subject to termination from employment. Employees may report any guest, passenger, or employee believed to be engaged in human trafficking activities or the sexual exploitation of an individual to their leaders, corporate security, the legal department, or local authorities, as appropriate.

WestJet remains committed to taking swift and robust action in the event that any evidence relating to slavery or human trafficking in our supply chain is identified.

### **What we are doing**

We are passionate about helping people in the best way we know how, by providing a caring experience in all cases, and through the gift of flight. WestJet supports Beyond Borders ECPAT Canada, an organization that advances the rights of children everywhere to be free from sexual abuse and exploitation. WestJet provides the "Gift of Flight" vouchers to this organization. Similarly, we have provided flights to Action Coalition on Human Trafficking Alberta (ACT Alberta) to get victims of human trafficking to safety. As part of our WestJet Cares for Kids program, we have also partnered with the Missing Children Society of Canada.

**Next steps**

WestJet's larger training program for our employees is planned to be rolled out in late 2019. A portion of this training will use ICAO Guidelines for Training Cabin Crew on Identifying and Responding to Trafficking in Persons. This training will assist our front-line staff with how to detect the behavior and signs of potential victims, along with a procedure for reporting what they see.

In 2019 through 2020, WestJet shall establish a Modern Slavery Working Group. This group will monitor and discuss any potential high-risk areas, incidents, and actions in relation to modern slavery.

A handwritten signature in black ink, appearing to read "Ed Sims". The signature is written in a cursive, flowing style.**Ed Sims**

President and Chief Executive Officer