

Signature Litigation LLP
138 Fetter Lane
London, EC4A 1BT

T: +44 (0)20 3818 3500
F: +44 (0)20 3818 3501

27 April 2020

By email

Financial Conduct Authority
12 Endeavour Square
London
E20 1JN

Your ref
Our ref

SJB/2625.4

For the intention of the Market Integrity Unit

Dear Sirs/Madams

easyJet PLC - Short Selling and the Upcoming EGM on 22 May 2020

As you are aware from our previous correspondence, we act for Sir Stelios Haji-Ioannou and easyGroup Holdings Limited (together, "**our clients**"). Sir Stelios is the founder of easyJet PLC (the "**Company**") and the Chairman of easyGroup, which represents approximately 34 per cent of the shares in the Company. The shares are held through various nominees including UBS Private Banking Nominees Limited and Vidacos Nominees Limited.

As you are also aware, our clients are very seriously concerned about the manner in which the Directors of the Company are managing the response to the Coronavirus Crisis (the Crisis), which is having (and will continue to have) a devastating effect on the airline companies and the wider aviation industry. You are aware from our previous correspondence that our clients consider that the recently announced deferral of aircraft purchases from Airbus should be treated as a Class 1 Transaction requiring shareholder approval. The FCA has yet to respond substantively to that point and we have written to you on 26 April requiring you to respond by the end of this week. It is vitally important that shareholders get the opportunity to scrutinise exactly what the deferral arrangement entails.

In response to what our clients consider is gross mismanagement of the Company's handling of the Crisis they have requisitioned an EGM of the Company's shareholders to vote on the removal of 4 of its current Directors: John Barton, Johan Lundgren, Andrew Findlay and Andreas Bierwirth. The meeting is scheduled to be held on 22 May 2020 (although the manner in which the meeting has been convened is likely to be challenged for various reasons unconnected with the substance of this letter).

Our clients are aware that the Company's shares are being heavily short sold, and they are concerned about the impact such short selling may have on the voting at the EGM. Plainly, in any conventional short selling scenario, the voting rights follow the shares and so voting rights attached to shares sold by a short seller will be capable of being exercised by the ultimate buyer. However, our clients are concerned where shares may be "*lent*" on terms which permit the borrower (who may also be a short seller) can vote the

shares- a practice which is expressly discouraged by the UK Money Markets Code Chapter 4, Clause 6.2.

Our clients wish to draw the FCA's attention to their concern and to make clear that they will use all of their rights to investigate conduct along the lines described in the preceding paragraph, and seek legal redress in the event that a co-ordinated attempt on the part of short sellers (and their accomplices) to vote borrowed easyJet shares with a view to influencing the outcome of the EGM is discovered.

For the avoidance of doubt, our clients consider that the removal of the Directors at the EGM will enable the Company to take a radically different approach to the handling of the Crisis and the intended payments to Airbus in the current financial year and beyond, and that accordingly the Company may avoid the fate which the short sellers appear to anticipate.

Yours faithfully

A handwritten signature in cursive script that reads "Signature Litigation LLP".

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