

Zlatko Custovic, Investor Relations
Wizz Air Holdings Plc, Kőér street 2/a, Building B
Budapest 1103, Hungary

[DATE]

Dear Mr. Custovic,

We write as [number] investors in your company, Wizz Air Holdings, who together represent USD\$ [figure] in assets under management.

As responsible investors, we are concerned with safeguarding a fair society and ensuring that the companies we invest in respect the fundamental human rights of their workers. Through our research, we have become aware of a series of incidents that suggests there may be a pattern of behaviour at Wizz Air which actively discourages the formation of unions:

- In 2014, Wizz Air dismissed 19 employees in Romania. This incident happened shortly after those employees had informed Wizz Air that they had formed a union. The Supreme Court of Romania subsequently ruled that Wizz Air had discriminated against these employees and a fine was imposed.^{1,2}
- In June 2020, Wizz Air's CEO, József Varadi, made the following statement in an interview: "Yes, we have been keeping out unions everywhere. Unions are killing the business. That's also one of the problems with Lufthansa. If the unions try to catch us and to kill us, we simply close the base and move on. That's the beauty of being an airline with the diversity and flexibility we have in our network: We can simply move our aircraft to another place."³
- In July 2020, Wizz Air dismissed four employees in Ukraine who were key members of a union. This incident happened three months after the union was formed. In 2021, Wizz Air lost a legal case against the union, as well as the Ministry of Justice and the state registrar who approved the union's registration.^{4,5}
- In late 2020, Wizz Air faced considerable tensions with trade unions and the government in Norway over the company's position on collective bargaining. This led to a number of local boycott campaigns against the company.⁶
- In April 2021, Italian unions sought to introduce a collective contract with Wizz Air to ensure fair treatment for its employees vis-à-vis staff from other airlines. Wizz Air subsequently informed the Italian Ministry of Labour of their intention to operate in the country without engaging with unions.⁷
- In spring 2021, an internal leak revealed that the company may have used discriminatory criteria to dismiss pilots in 2020.

The right to form and join unions is a fundamental human right enshrined in global and regional conventions and national laws, including but not limited to:

¹ European Transport Workers' Federation (2015). Romanian anti-discrimination office convicts Wizz Air of discrimination. Available at: <https://www.etf-europe.org/romanian-anti-discrimination-office-convicts-wizz-air-of-discrimination/>.

² European Transport Workers' Federation (2021). Romanian court system forces Wizz Air to give back jobs to fired pilots and cabin crew. Available at: <https://www.etf-europe.org/romanian-court-system-forces-wizz-air-to-give-back-jobs-to-fired-pilots-and-cabin-crew/>.

³ Nowack, T. (2020). Interview with Jozsef Varadi of Wizz Air: "Then we simply close the base and move on." Available at: <https://www.aerotelegraph.com/en/then-we-simply-close-the-base-and-move-on>.

⁴ European Transport Workers' Federation (2021). "They tried to destroy the union, but we won" – Wizz Air aircrew union in Ukraine declared lawful by a court. Available at: <https://www.etf-europe.org/they-tried-to-destroy-the-union-but-we-won-wizz-air-aircrew-union-in-ukraine-declared-lawful-by-a-court/>.

⁵ Ukrainian Helsinki Human Rights Union (2021). Freedom of Association as a Major Component of Human Rights Protection. Available at: https://helsinki.org.ua/wp-content/uploads/2021/05/Press_Free_Association_A4_bw.pdf.

⁶ Loh, C. (2021). Wizz Air Shutting Down Domestic Routes in Norway. Available at: <https://simpleflying.com/wizz-shutting-norway-domestic/>

⁷ Reuters (2021). Wizz Air rejects Italian union calls for collective bargaining. Available at: <https://www.reuters.com/article/wizz-air-italy-idUSL8N2MJ4NZ>.

- The Universal Declaration on Human Rights, which states that workers have the right to establish and join “*organisations of their own choosing without previous authorisation*”.⁸
- International Labour Organization (ILO):
 - Convention on Freedom of Association and Protection of the Right to Organise (No. 87), which states that workers have the right to freedom of association.⁹
 - Right to Organise and Collective Bargaining Convention (No.98), which protects workers against anti-union discrimination and employer’s acts of interference with freedom of association principles.¹⁰
- Article 11 of the European Convention on Human Rights, which protects “*the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions.*”¹¹
- UN Guiding Principles on Business and Human Rights requires all businesses to respect the internationally recognised human rights and fundamental freedoms.¹²

Unions enable workplace dialogue and fair working conditions, which contribute to safe and productive workplaces.¹³ Whilst we understand that Wizz Air manages its labour relations through an internal body, Wizz People Council, we are concerned about the effectiveness of this body in communicating staff concerns to management. This is particularly the case given concerns recently raised by a whistleblower around pilot fatigue and flight safety.¹⁴ Accordingly, recognising workers’ freedom to form and join unions is not only a legal and moral responsibility of the employer, but also an important risk mitigation strategy.

To remedy our concerns, we therefore encourage Wizz Air to publicly and formally recognise employees’ rights to form and join unions; and commit to non-discrimination on the basis of union membership. Other European low-cost carriers, including easyJet and Ryanair, already recognise unions, and we hope Wizz Air will soon follow suit.

We would welcome the opportunity to discuss these issues with you further. In the first instance, we ask that you send your response to ricompliance@ardevora.com. We look forward to hearing from you.

The list of investors supporting this request is detailed below in the Annex.

Sincerely,



William Pattison
Chief Executive Officer
Ardevora Asset Management LLP



Anders Schelde
Chief Investment Officer
AkademikerPension

⁸ United Nations (1948). Universal Declaration on Human Rights. Available at: <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

⁹ ILO (1948). Convention (No.87) Concerning Freedom of Association and Protection of the Right to Organise. Available at: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C087:NO.

¹⁰ ILO (1949). Convention (No. 98) Concerning Right to Organise and Collective Bargaining. Available at: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100_INSTRUMENT_ID:312243:NO.

¹¹ Council of Europe (1950). European Convention on Human Rights. Available at: https://www.echr.coe.int/Documents/Convention_ENG.pdf.

¹² OHCHR (2011). UN Guiding Principles on Business and Human Rights. Available at: https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf.

¹³ European Transport Workers’ Federation (2021). “Now is the time to clean up the airline” – internal leak exposes Wizz Air anti-worker practices. Available at: <https://www.etf-europe.org/now-is-the-time-to-clean-up-the-airline-internal-leak-exposes-wizz-air-anti-worker-practices>.

¹⁴ Godfrey, H. (2021). Wizz Air redundancies ‘dangerously influenced’ flight safety culture claims whistleblower. Available at: <https://www.cityam.com/wizz-air-redundancies-dangerously-influenced-flight-safety-culture-claims-whistleblower/>.

Annex: Investor Signatories