



Anti-Slavery and Human Trafficking Statement

re: FYE 31 December 2019

Purpose

This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “UK Act”) and the Australian Modern Slavery Act (Commonwealth) (the “Australian Act”) (together the “Acts”) and is published on behalf of John Menzies plc (the “Company”) and certain of its wholly owned subsidiaries i.e. Menzies Aviation (UK) Limited, Menzies Aviation (ASIG) Limited, Air Menzies International Limited, Menzies Aviation (Holdings) Australia Pty Limited and Menzies Aviation (Ground Services) Australia Pty Ltd (together the “Subsidiaries”), each being required to report under one or both of the Acts. References in this Statement to “we”, “us” or “our” are to both the Company and its Subsidiaries.

This is our updated Statement for the financial year ending 31 December 2019 and our first under the new Australian Act. It details the steps we have taken to address modern slavery and human trafficking risks and to ensure that slavery and human trafficking do not occur in our supply chains or any part of our business.

Consultation

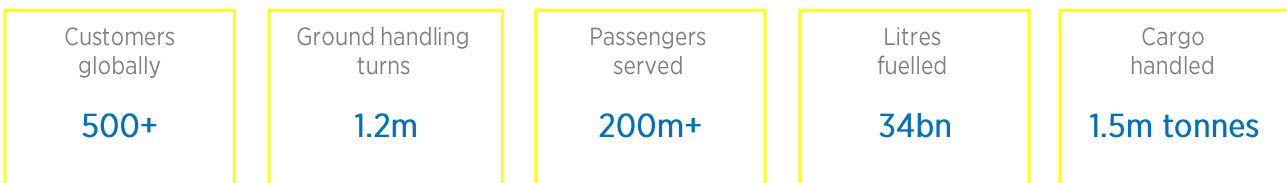
This joint Statement has been prepared in consultation with stakeholders from each of the qualifying Subsidiaries by directly liaising with them on specific factors affecting their businesses, supply chains and the geographies they operate in. This includes consultation with those Australian entities listed below.

Our governance and compliance procedures including due diligence, training and policies are set by the Company and cascaded to all Subsidiaries setting the standards that must always be followed globally. Ultimate responsibility for all Subsidiaries rests with our Company Board of Directors. The Board of Directors of each of the Subsidiaries are aware that this statement is being made on their behalf and have been given the opportunity to participate in the preparation of this statement.

Our Business

Established in 1833 and with its head office in Edinburgh, the Company is one of Scotland’s largest companies with its success depending upon providing an efficient, high quality, time-critical service to its customers and partners. Today the Company is a leading global provider of landside and airside services operating at 202 airports in 34 countries, supported by over 28,000 dedicated and highly skilled Menzies people.

Our aim is to deliver the safest, most secure and sustainable landside and airside services tailored to our customers’ needs, and by doing so, be recognised as a solution provider and the leading aviation services provider in our marketplace.



All figures based on 2019

Each year Menzies Aviation serves over 500 customers, handling 1.2 million flights, 1.5 million tonnes of cargo, fuelling 3.6 million turnarounds and welcoming 1.5m lounge guests.

Customers include Air Canada, Air France-KLM, American Airlines, Cathay Pacific, Qantas, Delta Air Lines, easyJet, Emirates, Frontier Airlines, IAG, Lufthansa, Norwegian Air Shuttle, Singapore Airlines, United Airlines and China Airlines. Best in class safety and security is the number one priority each day and every day.

The John Menzies Group is managed on a geographical basis primarily in three regional segments (Americas, EMEA (incorporating Northern Europe, United Kingdom & Ireland and Mediterranean & Africa) and Rest of World), with the Cargo Forwarding segment managed globally.

You can view further details of our business in our latest Annual Report and Accounts:

<https://www.johnmenziesplc.com/investor-centre/reports-presentations-results-general-meetings/annual-report-and-accounts-2019/>

Our Australian entities listed below undertake aviation ground handling services, lounge and cargo services at 10 airport locations across Australia and are supported by approximately 2,200 dedicated and highly skilled employees.

- Menzies Aviation (Australia) Pty Ltd
- MA (Holdings) Australia Pty Ltd
 - o Menzies Aviation (Ground Services) Pty Ltd
 - Australian AirSupport Pty Ltd
 - o Air Menzies International (Aust) Pty Ltd
 - o Skystar Airport Services Pty Ltd
 - o Perth Cargo Centre Pty Ltd
 - o Gold Coast Air Terminal Services Pty Ltd

Our global supply chains include but is not limited to consultancy and professional services, cleaning and security companies, labour and agency providers, equipment providers, IT solutions, infrastructure and hardware, uniform and PPE providers, de-icing suppliers, aircraft fuel companies, catering/food and drink providers, other aviation services providers.

Within our Australian operations, our main suppliers include but are not limited to: Cabin Services Australia who provide aircraft cabin cleaning services; OCS who provide wheel-chair services; Bailey Personnel who are an aviation services labour provider; Wymap Group who provide labour and trucking solutions; Selection Clothing our uniform provider; and TCR our ground services equipment provider. We also rely on many third parties for IT services, office supplies and office cleaning.

The Company operates in compliance with all applicable labour legislation in all jurisdictions. Menzies Aviation (Australia) Pty Ltd, Menzies Aviation (Ground Services) Pty Ltd and Australian AirSupport Pty Ltd are all registered labour hire providers in Victoria, Australia, in accordance with local legislation.

Risks of Modern Slavery Practices

As with other global businesses, we understand that there are risks of modern slavery practices occurring within our business, supply chains and operations. The below table provides an overview of the risks of modern slavery practices that could arise in relation to our operations, as well as our supply chains. We also set out some of the measures we have taken to address those risks.

Modern Slavery Risk	Potential Issues	Actions taken to assess and address risks
Directly employed staff	Staff employed without following recruitment processes which include appropriate background checks for suitability and ability to work lawfully in the relevant jurisdiction and to ensure appropriate payment.	We have robust recruitment practices, including conducting background and right-to-work checks, in place to ensure employees are engaged appropriately and in compliance with applicable law. Additionally, we comply with the Fair Work Commission modern award for Airline Operations – Ground Staff.
Labour providers and service providers	Engaging with labour providers who are themselves engaging in modern slavery, including, underpaying staff wages and employee entitlements.	We have robust practices in place when engaging with labour agencies or providers to ensure they are required to comply with applicable laws. As set out below,

	Employee misclassification.	this includes undertaking due diligence procedures and ensuring the correct contractual provisions are in place. We also assess whether the contractor may themselves have Modern Slavery reporting obligations, which we can review.
Suppliers	Engaging with suppliers who are engaging in modern slavery practices including, underpaying staff wages and employee entitlements or engaging in human trafficking.	We set out our actions in relation to suppliers below.
Indirect risks within our supply chain	Engaging with suppliers whose own supply chains may be at increased risk from modern slavery practices, including forced labour, underpaying staff wages or engaging in human trafficking.	We set out our actions in relation to these categories of suppliers below, including enhanced due diligence and evidence of independent audits. We may also undertake our own audits, where appropriate.

Supply Chain Risk Assessment

We recognise that modern slavery is a crime and a fundamental violation of human rights. We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains.

As a service provider ourselves, it is important to us that we lead by example and demonstrate to our own stakeholders that we set and operate to the highest standards, acting responsibly and ethically at all times. In accordance with this, we expect the same of our own third parties, including suppliers, contractors, consultants (our “Suppliers”) and joint venture partners.

We therefore seek to ensure that we engage only with those Suppliers who uphold the values to which we adhere and require that all our Suppliers, through contractual commitments, act ethically and with integrity at all times, sharing our commitment to humane and safe working practices.

We work with many Suppliers across the globe many of whom are critical to our success. We acknowledge some of these Suppliers may operate in sensitive industries and countries (as identified in the Global Slavery Index 2018) and the risk of modern slavery may be greater in some areas than in others. This is considered within our overall risk assessment process along with information from other relevant resources.

As part of our continued analysis of our Supplier population, we continue to evolve the monitoring of our supply chain and our modern slavery risk assessment as part of our wider supplier assurance and onboarding processes. As part of this, we identify categories of suppliers who may pose a higher risk from a modern slavery perspective including our uniform and PPE suppliers, suppliers of temporary/short-term labour, service providers such as cleaning contractors, as well as information technology suppliers. These category factors also inform our risk assessment process and help ensure we focus due diligence and assessment efforts in the best way.

All our Suppliers are expected to be able to demonstrate and provide evidence where appropriate, of the standards they adhere to and to complete a level of risk-based due diligence. In some circumstances this may include audits and independent verification of standards.

Contractual Controls and Due Diligence

Our zero-tolerance position in relation to slavery and human trafficking is further supported through the incorporation of suitable provisions within our Supplier contracts. We will continue to review both future and current Supplier contracts and, where possible/if considered appropriate, strengthen their terms to further limit the likelihood of slavery or human trafficking occurring in our supply chains or any part of our business.

Our [Third Party Code of Conduct](#) forms part of all new Supplier contractual arrangements and during 2019 we continued the process of ensuring that our existing Suppliers also sign up to and comply with this Code including recertification upon contract renewal. This Code makes clear our expectation that our Suppliers will adhere to all applicable laws and regulations and operate ethically at all times, ensuring the safety and fair treatment of their employees. Our Third Party Code of Conduct is available to view at:

<http://www.johnmenziesplc.com/third-party-code-of-conduct/>.

We adopt a risk-based approach to due diligence and continue to work on adapting and enhancing our due diligence processes on a range of issues, including modern slavery and human trafficking, prior to entering into a relationship with any Supplier who may be considered high risk and/or who operates in a higher risk region(s).

To support our due diligence processes for Suppliers and other business partners including our joint venture partners, we are continuing to review options for a Business Partner Onboarding and Monitoring system with the aim of streamlining and innovating our internal processes and controls by providing a holistic Business Partner Onboarding Solution. This will ensure consistency, quality and transparency across our whole Supplier population and better assist us in our ongoing monitoring activities. We expect this to be a 2021 deliverable.

Policies, Procedures and Compliance

The ability to demonstrate our commitment to operating fairly, honestly and in compliance with all applicable legislative, regulatory and ethical requirements is becoming an increasingly important part of how we do business. As a Group we take our responsibilities seriously and it is vital that we lead by example and show our People, and all of our stakeholders, that we wish to foster a culture in which integrity and responsible and ethical values are at the very core of all our activities and decision-making processes, wherever we operate in the world, and any abuse of human rights, either within our business or by anyone employed by or associated with it, will not be tolerated.

Our Group Compliance Manager is responsible for driving the Group's global Compliance Programme including our approach and response to Modern Slavery. Our Compliance Programme has the full support of our John Menzies plc Board and applies group-wide including all Subsidiaries. The ultimate responsibility for its success is owned by our John Menzies plc Director of Corporate Affairs.

We are committed to ensuring our Compliance Programme remains fit for purpose and continues to evolve and improve in line with changing legislation, business priorities and risk areas, as well as the changing expectations of our stakeholders. A key focus of our Compliance Programme is to regularly refresh and improve our Compliance Programme suite, including policies, procedures, training and controls, and to seek improved engagement with our People and our Suppliers.

Our [Code of Conduct](#) remains at the centre of our Compliance Programme. It aims to create and support a culture of ethics, integrity, respect, pride and excellence in our organisation, providing a framework for 'doing the right thing, at the right time'. It is intended to provide our People, at all levels of our organisation, with the awareness and understanding of the values and behaviours expected of them. It covers key areas of ethics and compliance, including modern slavery and human trafficking, human rights and anti-bribery and corruption.

We have a dedicated [Anti-Slavery and Human Trafficking Policy](#), launched network-wide during 2018, which details our zero-tolerance approach to any form of slavery or trafficking in our supply chains or any part of our business. As with our Code and other key Group Compliance policies, this has been widely translated.

Grievance and Remediation

We offer many channels for seeking guidance, reporting concerns and raising grievances including our [whistleblowing](#) hotline, supported by our [Whistleblowing Policy](#), which has been in place across the Group's global network since 2016 and is regularly promoted. This platform is designed to encourage our People and third parties to report any issues or concerns around unethical conduct, malpractice, illegal acts or failures, including human rights' violations such as slavery or human trafficking. Reports can be made anonymously, are always treated confidentially and will be fully investigated and, where required, remedial action will be taken. We adhere to all applicable legislation as well as our own policy standards in protecting the rights of those making reports in good faith.

We continue to undertake risk assessments and analysis across our organisation to ensure consistency, comprehensiveness and quality in the manner and mode of Supplier assessment, both pre and post engagement and are fully committed to conducting the appropriate investigations and taking the necessary actions should evidence of modern slavery ever be identified.

Where any issues are identified, we will require that immediate remedial steps are taken to ensure compliance with appropriate standards and legislation. As part of our approach to remediation, we will seek to work together with Suppliers (and other Business Partners), providing guidance and training on modern slavery, as well as other compliance topics, where we believe this may be appropriate and/or beneficial.

During 2019, we investigated a service provider when concerns were raised around the standards experienced by their workforce including the number of hours being worked and salary arrangements. Following our investigation, we were satisfied that standards were being met but recommunicated our expectations including our Third Party Code of Conduct and sought reassurance these standards would be maintained. It is important to us to remediate, support and educate wherever possible.

We are not aware of any incidents of modern slavery within our supply chains or any part of our business to-date.

Training

All our employees are required to undertake online training which reinforces the behaviours we expect of our People, the repercussions of failing to adhere to such standards and the steps that should be followed to report potential breaches of any of our policies or procedures.

During 2019 we rolled out our [Anti-Slavery and Human Trafficking Awareness e-learning module](#) to all Group employees and new joiners, which will be repeated biennially. This is designed to increase awareness of modern slavery and human trafficking to ensure our People are better equipped to spot and report any concerns that may arise in the course of their work for us as well as in their personal lives. Within this we incorporated a short video produced by one of our airline industry partners, the International Air Transport Association (IATA), as part of their [#eyesopen](#) campaign to fight human trafficking.

Many of our employees operate in customer facing roles, engaging with vast numbers of airline passengers in airports across the globe every year. This affords them the opportunity to spot signs of, report and ultimately prevent potential occurrences of human trafficking in within the airport environment. We are proud to play our part in any helping to prevent any such violations of human rights occurring, wherever possible.

The launch of our bespoke [Code of Conduct e-learning module](#) was rescheduled for launch in 2020, accompanied by our updated Code of Conduct. Our new e-learning is designed to ensure there is a Group-wide understanding of our Code and the expectations, behaviours and ethical practices it promotes. This module will also include appropriate reference to and reinforcement of our zero-tolerance position on

modern slavery and human trafficking and will also be complemented by our new [Diversity and Inclusion](#) and [Anti-bullying and Harassment](#) e-learning modules.

For our senior leaders, we have been conducting face-to-face training providing greater awareness of key compliance topics including modern slavery but with a key focus on anti-bribery and anti-corruption. This is part of an ongoing engagement activity, providing tailored learning for different audiences across our Group and better equipping them with the knowledge and skills to support them in their own roles as well as to support their teams.

Measuring Performance

We measure completion of our internal training modules, ensuring all employees complete these as required. This provides a basic level of assurance that we are raising awareness of modern slavery as well as other core compliance topics and our ethical standards, across our business globally.

Our Audit Programme and associated documentation take into account the provisions of the Acts. These are reviewed regularly and reflect, inter alia, our Code of Conduct and Anti-Slavery and Human Trafficking Policy, together with our Third Party Code of Conduct. We monitor and review these elements of our Audit Programme regularly and incorporate any improvements or additions as new procedures and controls are embedded. Where issues are identified in the course of our Audit Programme, we will require that immediate remedial steps are taken to ensure compliance or, if necessary, relationships with Suppliers will be terminated. We also review our Code of Conduct and other policies and procedures regularly to ensure that they continue to remain appropriate.

COVID-19 Impact

Although a 2020 occurrence, the impact of COVID-19 on our operations has been significant to our global operations during the first half of 2020 as we prepare this Statement. This has resulted in an increased focus on our supplier and customer populations as companies experience challenges.

We have increased our focus on new supplier due diligence, with a new risk-assessment process being introduced for all new suppliers including an updated questionnaire.

With resource being focused elsewhere, this has led to some activities being reprioritised and the timescales for activities outlined in our Statement reflect this.

Key Areas of Action 2020/2021

Our aim is to ensure that our ethical and legal obligations and responsibilities in relation to modern slavery and human trafficking, together with other key compliance topics, remain at the forefront of our employees' and Suppliers' minds through the various means referred to above.

We commit to continuing to keep the Group's supply chains under review to identify and monitor ongoing and future risks.

We have identified key areas of action to be progressed over the next two years that will help us strengthen our measures to detect and prevent slavery and human trafficking taking place in our supply chains or any part of our business:

- Continue to develop and expand our Supplier due diligence and Business Partner onboarding procedures and seek to implement a new systems solution.
- Develop increased transparency on the geographical spread and categorisation of our Supplier population and deeper analysis across the tiers.
- Seek new opportunities and ways to better collaborate with our business and industry partners that help us build on best practice and incorporate learnings.
- Continue to develop and create awareness of modern slavery and other human rights risks across our Group.

This Statement has been approved by the Board of Directors of John Menzies plc and signed on behalf of the Company and all Subsidiaries by John Geddes, Director of Corporate Affairs & Group Company Secretary. It has also been approved by the Board of each of the Subsidiaries required to report under the Australian Act, and signed by a director of each of those Subsidiaries.



2nd July 2020

John Geddes
Director of Corporate Affairs & Group Company Secretary

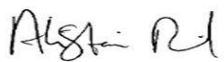
John Menzies plc



2nd July 2020

Darren Masters
Director

MA (Holdings) Australia Pty Ltd



2nd July 2020

Alistair Reid
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Menzies Aviation (Ground Services) Australia Pty Ltd