



Anti-Slavery and Human Trafficking Statement  
19 June 2017

# John Menzies plc

## Anti-Slavery and Human Trafficking Statement

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and is published on behalf of John Menzies plc (the "Company") and its wholly owned subsidiaries Menzies Distribution Limited, Menzies Aviation (UK) Limited and Air Menzies International Limited (the "Subsidiaries"), each carrying on business in the UK and having a turnover in excess of £36 million. References in this Statement to "we", "us" or "our" are to both the Company and its Subsidiaries.

This Statement sets out the steps taken by us to ensure that slavery and human trafficking do not occur in our supply chains or any part of our business. It applies for the financial year ending 31 December 2016.

### Our Business

Established in 1833 and with its Head Office in Edinburgh, the Company is one of Scotland's largest companies and is the ultimate parent company of a group of companies which provide high quality, time-critical logistics and support services to customers and partners (the "Group"). The Group has worldwide operations and is composed of two distinct operating divisions – Menzies Aviation and Menzies Distribution.

Menzies Aviation is a leading global provider of passenger, ramp and cargo services and, supported by a team of some 31,600 highly-trained people, operates at 209 airports in 34 countries.

Menzies Distribution operates one of the largest overnight logistics networks in the UK, providing final mile delivery for over 100 million delivery units each year and serving customers in the press, travel and third-party logistics sectors. In addition to its core role within the UK print media supply chain, the division is expanding into both UK retail logistics and neutral consolidation within the fast growing parcel delivery market.

The Group is managed on a divisional and geographical basis. Our Distribution division in the UK and Ireland operates as one segment. Our Aviation division is managed primarily in three regional segments (Americas, EMEA and Rest of World), with the Cargo Forwarding segment managed globally. You can view further information about our operating divisions by clicking on the following link:

<http://www.johnmenziesplc.com/about-us/our-businesses/>

### Supply Chains

We recognise that modern slavery is a crime and a fundamental violation of human rights and we seek to ensure that we engage only with those contractors, suppliers and business partners (our "Suppliers") who uphold the values to which we adhere. Both our operating divisions rely on long-term, working relationships with our Suppliers whose capability and performance, ethical and otherwise, are critical to our success. Operating on both a national and international platform, we require that our Suppliers, through contractual commitments, act ethically and with integrity at all times, sharing our commitment to humane and safe working practices.

We recognise that we work with Suppliers in sensitive industries and countries (as identified in the Global Slavery Index 2016), and are committed to ensuring that we engage only with those who treat workers with respect and dignity and who adopt the equivalent standards to those which we observe.

Going forward we intend to: (i) increase our focus on those Suppliers in our supply chains and regions which could be considered to be higher risk; and (ii) consult with those identified as presenting significant risk to ensure we fully understand the controls which they have in place.

## Policies, Procedures and Compliance

Our Ethics Policy underlines the Group's dedication to operating fairly, honestly and in compliance with all applicable legislative, regulatory and ethical requirements. This policy plays an integral role in the Group's corporate governance framework and applies to all Group-operated businesses. Wherever we operate in the world we believe we must foster a culture in which integrity and responsible and ethical values are at the very core of all our activities and decision-making processes and any abuse of human rights, either within our business or by anyone associated with it, will not be tolerated.

An Anti-Slavery and Human Trafficking Policy will be rolled-out in 2017. This Policy will be approved by our Board of Directors and will detail our zero tolerance approach to any form of human slavery or trafficking in our supply chains or any part of our business. It will initially be launched in the UK and will thereafter be launched on a global basis.

An updated Third Party Code of Conduct will, in conjunction with TRACE International, also be launched in 2017, detailing the standards we require our Suppliers (and others in our supply chains) to adhere to. Going forward, all our key/high-risk Suppliers will be required to sign up to, and comply with, this Code and annual certification of conformance will be required.

A whistleblowing hotline was implemented across the Group's global network in 2016. This platform is designed to encourage employees to report any issues or concerns around malpractice, illegal acts or failures, including human rights violations such as slavery or human trafficking. Reports can be made on an anonymous basis and will be fully investigated and, where required, remedial action taken.

## Contractual Controls and Diligence

Our zero tolerance position in relation to slavery and human trafficking is further supported through our continued objective to incorporate suitable provisions within our Supplier contracts and obliging the counterparty to confirm they will operate in a manner which is consistent with our Ethics Policy. 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.

Further, robust due diligence will be undertaken on a range of issues including modern slavery and trafficking prior to entering into a relationship with any Supplier who may be considered high risk/ operates in a higher risk region(s). Where deemed appropriate, expert external providers will be engaged to carry out such diligence.

## Training

Upon joining the Group, employees are required to undertake online Ethics training, which training reinforces the behaviours we expect of all of Group employees, the repercussions of failing to adhere to such standards and the steps employees should follow to report potential breaches of our Ethics Policy. Going forward it is envisaged that Group employees will undertake such training on an annual basis.

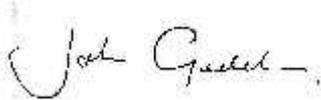
An e-learning module on Avoiding Trafficked Labour will be introduced in 2017. This training will be targeted at relevant members of our business services teams such as those involved in procurement and management of our supply chains. Using real life scenarios, it will provide an understanding as to how potential concerns or issues around slavery or human trafficking in our supply chains and other areas of our business can be identified and raised.

## Measuring Performance

Our audit programs and associated documents will be updated to take into account the provisions of the Act and to reflect our new Anti-Slavery and Human Trafficking Policy as referred to above. Where any issues are identified, we will require that immediate remedial steps are taken to ensure compliance or, if necessary, relationships with Suppliers will be terminated.

We will continue to keep the Group's supply chains under review to identify and monitor ongoing and future risks. Drawing on best practice, regulatory requirements and/or industry guidance which may develop, we will seek to strengthen our measures to detect and prevent slavery and human trafficking taking place in our supply chains or any part of our business.

This Statement has been approved by the Board of John Menzies plc and signed by John Geddes, Director of Corporate Affairs.

A handwritten signature in black ink that reads "John Geddes". The signature is written in a cursive style and is positioned above a horizontal line.

John Geddes

19 June 2017