



# Anti-Slavery and Human Trafficking Statement

re: FYE 31 December 2018

## Purpose

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 certain of its wholly owned subsidiaries i.e. Menzies Aviation (UK) Limited, Menzies Aviation (ASIG) Limited and Air Menzies International Limited (together 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 is our updated Statement for the financial year ending 31 December 2018 and it details the steps we have taken to ensure that slavery and human trafficking do not occur in our supply chains or any part of our business.

## 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 an international Aviation Services business with operations worldwide.

Menzies Aviation is a leading global provider of passenger, ramp and cargo services, operating at 219 airports in 37 countries and supported by a team of some 33,000 highly-trained people. Each year Menzies Aviation serves some 1,000 customers, handling 1.4 million flights, 1.6 million tonnes of cargo and fuelling 4 million turnarounds. Customers include Air Canada, Air France-KLM, American Airlines, Cathay Pacific, Delta Air Lines, easyJet, Emirates, Frontier Airlines, IAG, Lufthansa, Norwegian Air Shuttle, Air Canada, United Airlines and China Airlines. Best in class safety and security is the number one priority each day and every day.

Menzies Aviation operates in a structural growth market which has strong outsourcing trends as well as progressive market growth. As a global player in the Aviation Services market Menzies is well-placed to be a leading player as the market continues to professionalise and will continue to embrace and develop new technologies to provide market-leading service.

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 information about our business by clicking on the following link:

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

## 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.

We work with a large number of third parties, including contractors, suppliers and business partners, across the globe (our "Suppliers"), 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.

We 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 have commenced analysis of our Supplier population and are currently assessing Business Partner Onboarding and Monitoring systems with the aim of streamlining and innovating our internal processes and controls by providing a holistic [Business Partner Onboarding Solution](#). We believe this will both benefit our business and further demonstrate our commitment to our ethical and legal responsibilities.

Whilst we are not aware of any incidents of modern slavery within our supply chains or any part of our business to-date, 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. We also seek to provide guidance to and educate our Suppliers on modern slavery, as well as other compliance topics, where we believe this may be appropriate and/or beneficial and are fully committed to conducting the appropriate investigations and taking the necessary actions should evidence of modern slavery ever be identified.

## **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. Our Compliance Programme has the full support of our Board and ultimate responsibility for its success is owned by our Director of Corporate Affairs. A key focus of our Compliance Programme is to review, 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 Group [Code of Conduct](#) lays the foundations 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. In addition, our Group [Anti-Slavery and Human Trafficking Policy](#), launched network-wide during 2018, details our zero-tolerance approach to any form of slavery or trafficking in our supply chains or any part of our business.

During 2018 we cascaded global communications that sought 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.

Our whistleblowing hotline has been in place across the Group's global network since 2016 and is regularly promoted. This platform is designed to encourage our People 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 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.

During 2018 we created a new [Third Party Code of Conduct](#) and launched this across our network. 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](#) now forms part of all new Supplier contractual arrangements and is available to view at:

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

Additionally, we have begun the process of ensuring that our existing Suppliers also sign up to and comply with this [Third Party Code of Conduct](#) and it is intended that re-certification will take place annually or upon contract renewal.

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). This links directly into the [Business Partner Onboarding Solution](#) exercise referred to above.

## 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.

Our bespoke [Code of Conduct](#) e-learning module is scheduled for launch during 2019 and is designed to ensure we maximise awareness of the Code's key principles and improve both our ethical culture and general compliance appetite across the Group. This module will also include appropriate reference to and reinforcement of our zero-tolerance position on modern slavery and human trafficking.

Additionally, our recently launched [Anti-Slavery and Human Trafficking Awareness](#) e-learning module has now been rolled-out to all Group employees. Within this we have 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. We hope this module provides an appropriate awareness for all our People in both their professional and personal lives.

All new employees will be expected to undertake both aforementioned modules as part of their onboarding process and biennially thereafter.

It is intended that more in-depth training on modern slavery and human trafficking will also be introduced in due course, targeted at certain business services teams such as those involved in procurement and management of our supply chains. It is likely that this may be done in conjunction with the development and roll-out of our new [Business Partner Onboarding Solution](#).

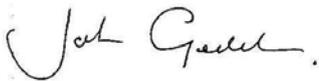
## Measuring Performance

Our Audit Programme and associated documentation take into account the provisions of the Act. 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 will continue to monitor and review these elements of our Audit Programme 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.

Our aim for 2019 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.

As previously intimated, 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 Directors of John Menzies plc and signed by John Geddes, Director of Corporate Affairs & Group Company Secretary.



**John Geddes**  
**Director of Corporate Affairs & Group Company Secretary**