

We aim to develop a culture of openness and are committed to being honest and accountable.

Consequently, it is fundamental that any genuine concerns which you may have about suspected malpractice within John Menzies plc are aired. It is clearly in all our interests to ensure that any malpractice does not occur.

This policy and procedure is intended to conform to the guidance in the UK's Public Interest Disclosure Act 1998 (PIDA). PIDA encourages you to raise concerns internally in the first instance. The policy and procedure is incorporated by reference into your Contract of Employment.

Definitions

The policy applies to all employees within John Menzies plc. It also applies to secondees, external consultants, contractors and agency personnel whilst at John Menzies plc.

Malpractice includes (but is not confined to): conduct likely to prejudice the standing of John Menzies plc, breaches of internal rules or of external regulations, criminal offences or breaches of civil law, endangerment of the health and safety of any person, environmental damage and the deliberate concealment of any malpractice.

A qualifying disclosure under PIDA is one which, in the reasonable belief of the person making the disclosure, suggests that one or more of the above has been committed, is being committed or is likely to be committed.

If you raise a malpractice concern, you will be taken seriously and will be treated fairly and justly by John Menzies plc. We will take all reasonable steps to ensure that no person under our control engages in victimisation in any form.

PIDA protects you in making a disclosure where this meets the requirements set out above, follows the procedure below, and is made in good faith.

Procedures

1. General

This policy is intended to provide you with an avenue to raise concerns within John Menzies plc. John Menzies plc will look into all claims in full, with the objective of establishing whether malpractice has occurred. You may assume that only the John Menzies staff who are investigating the concern will know your identity. However, there may be circumstances in which we may be required to reveal your identity. If this is the case, we will take all reasonable steps to ensure that you suffer no detriment.

If you raise a genuine concern, you will not be at risk of suffering any form of retaliation as a result. However, disciplinary action may be taken against anyone who deliberately raises false or malicious allegations.

2. Raising a concern

If you wish to raise a malpractice concern, you should inform your immediate manager. If your concern involves your immediate manager, or for any reason you would prefer them not to be told, you may raise the matter directly with a senior member of management. As the person raising the malpractice concern, you may be asked to attend a meeting to investigate your claim. You may be accompanied at such meeting (s) by a fellow employee of your choice.

3. Advice

If you wish to take advice before raising a concern, you may contact the independent charity, Public Concern at Work on +44 020 7404 6609 or helpline@pcaw.co.uk. They provide free, confidential legal advice on whistle-blowing matters. You should not disclose any confidential information regarding the Company and they will not expect you to do so.

4. External Contact

If you have disclosed your concern internally and are concerned either by the lack of response, or if you feel unable to talk to anyone internally for whatever reason, you can contact a body prescribed for the purpose under PIDA. A list of such bodies, the matters for which they have been prescribed, and the relevant test can be found at www.pcaw.co.uk or from Public Concern at Work as above.

5. Findings

The findings of the investigation will be communicated to:

- a) you as the person raising the malpractice concern;
- b) the individual(s) under investigation; and, if appropriate
- c) those members of John Menzies plc management or external authorities who need to consider whether action should be taken on the basis of the findings.

Paul Dollman
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