



# Anti-Slavery and Human Trafficking Statement

June 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 its wholly owned subsidiaries Menzies Distribution Limited, Menzies Aviation (UK) Limited, Menzies Aviation (ASIG) Limited, Air Menzies International Limited and EM News Distribution (NI) 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 2017 and it details 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.

## Our Business

The Company provides essential support services to fast-moving markets, operating 24/7 in 36 countries around the world. Established in 1833 and headquartered in Edinburgh, the Company's primary business is the provision of services to the global aviation industry through its Aviation Division.

Menzies Aviation is a leading global provider of passenger, ramp and cargo services; it operates at 212 airports in 34 countries, supported by a team of approximately 32,500 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 3.7 million turnarounds. Best in class safety and security is the number one priority each day and every day.

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, delivering over five million magazines and newspapers every day, 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 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 2016).

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.

Whilst we are not aware of any incidents of modern slavery within our supply chains or any part of our business to-date, we intend to undertake further 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.

## **Policies, Procedures and Compliance**

As a Group we take our responsibilities seriously and aim to demonstrate our commitment to operating fairly, honestly and in compliance with all applicable legislative, regulatory and ethical requirements. 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 employed by or associated with it, will not be tolerated.

During 2017 we appointed a Group Compliance Manager who is responsible for driving the Group's new 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 will be to review, refresh and improve certain of our compliance policies, procedures, training and controls, and to seek improved engagement with our People and our Suppliers. We are committed to ensuring that our business operates ethically at every level and that our People and Suppliers understand and share this commitment.

At the centre of our new Compliance Programme is our recently launched Group [Code of Conduct](#) which aims to help 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.

A number of new policies will support our [Code of Conduct](#), including our recently launched Group [Anti-Slavery and Human Trafficking Policy](#) which details our zero-tolerance approach to any form of slavery or trafficking in our supply chains or any part of our business.

We are working to increase awareness of modern slavery and human trafficking across our Group and to ensure our People are better equipped to spot and report any concerns that may arise in the course of their work for us. Our whistleblowing hotline was implemented across the Group's global network in 2016 and is regularly promoted. 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 Due 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. 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.

Additionally, as part of our commitment to ensuring all of our Suppliers adhere to the same standards and ethics as we do, we have developed a [Third Party Code of Conduct](#) that will shortly be launched across our global network. This [Third Party Code of Conduct](#) outlines the values, ethics and behaviours we expect from our Suppliers and reflects the principles contained in the aforementioned Group [Code of Conduct](#). Going forward, all of our Suppliers will be required to 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 have been working 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 operates in a higher risk region(s). We wish to ensure consistently high standards are applied when undertaking risk assessments and due diligence across our organisation and will continue to work on improving this process. Where deemed appropriate, expert external providers are engaged to support us in undertaking such diligence.

## Training

All employees are currently required to undertake online Governance training which reinforces the behaviours we expect of all our People, the repercussions of failing to adhere to such standards and the steps employees should follow to report potential breaches of our policies. In support of our new [Code of Conduct](#) and to ensure we maximise awareness of its key principles, improving our ethical culture and general compliance across the Group, it is our intention to launch a new [Code of Conduct](#) e-learning course during 2018. This course will include appropriate reference to and reinforcement of our zero-tolerance position on anti-slavery and human trafficking. All new employees will be expected to undertake this course as part of their onboarding process and annually thereafter.

Additionally, we are in the process of creating a Modern Slavery and Human Trafficking practical awareness module that will be shared with our People during 2018. 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.

A more in-depth e-learning module on modern slavery and human trafficking will also be introduced in 2018. 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 programme and associated documentation take into account the provisions of the Act. These are reviewed regularly and, going forward, will also be updated to reflect, inter alia, our new [Code of Conduct](#) and [Anti-Slavery and Human Trafficking Policy](#), together with our [Third Party Code of Conduct](#). It is expected that these will be further updated during 2018 to reflect additional improvements 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.

Additionally, we will seek to identify other means of measuring effectiveness and reporting. Our aim in 2018 is to achieve this through increased engagement and communication across our organisation and with our Suppliers.

As noted, 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.



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

**29 June 2018**