



**John Menzies plc**

**Modern Slavery  
Statement 2020**

July 2021

John Menzies plc

## 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 2020 – our second 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.

**John Menzies plc and its Subsidiaries have a zero-tolerance approach to all forms of modern slavery and are committed to protecting and promoting human rights.**

## An Ethical Approach

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.

The Company is a signatory of the United Nations Global Compact and is committed to aligning the global compact principles in the areas of human rights, labour, environment and anti-corruption within our policies, operations and strategies. We are setting our own goals and targets and initiating projects to develop our business while advancing the UN Sustainable Development Goals.

## 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 Structure & Operations

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 more than 200 airports in 37 countries, supported by a global team of over 25,000 highly trained people.

Our vision is to make Menzies Aviation the handling provider of choice wherever we operate by always being solutions oriented and working with our customers to deliver their goals safely and securely.

In 2020, despite the impact on the aviation industry from the global Covid-19 pandemic, Menzies Aviation handled 0.5 million aircraft turns, 1.2 million tonnes of cargo and fuelled 1.9 million turnarounds.

Customers include Air Canada, Air China, Air France-KLM, American Airlines, Cathay Pacific, easyJet, Frontier Airlines, IAG, Qantas Group, Qatar Airways, Southwest, United Airlines, WestJet and Wizz Air. 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).

Our core services include:

### Ground Services

We provide frontline airport services, both above and below the wing, ensuring passengers, crew and aircraft complete journeys efficiently and on schedule. Our fully rounded ground services offering includes: tailored passenger check-in services, customer relations, VIP meet and greet experiences, executive lounge services, full ramp handling services, baggage sorting, loading and tracing, de-icing services, cabin cleaning and presentation, asset maintenance, aircraft washing, and more.

### Fuelling Services

We provide into-plane fuelling services and fuel storage management to airlines, airports, oil companies and other partners across the world, adhering to highest standards of safety at all times.

### Air Cargo Services

We manage the global transportation of high value and time critical cargo by accepting, storing and preparing cargo for worldwide transit for our airline and cargo customers throughout our multi-airport location network. Within our cargo forwarding business, we are a neutral consolidator of air cargo, providing wholesale airfreight and express services exclusively to freight forwarders, packaging companies, customs brokers and courier agents.

Further details of our business can be viewed in our latest Annual Report and Accounts:

<https://menziesaviation.com/wp-content/uploads/2021/03/Annual-Report-and-Accounts-2020.pdf>

### Global Supply Chain

Our global supply chains rely on a number of key business partners and suppliers including, but not limited to, sectors including 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.

Our local entities in each of the countries we operate in engage with many local suppliers as well as global suppliers. We have undertaken some initial high-level analysis of our supplier population that shows the geographical split and typical industry classifications of our supplier population. This analysis will be further refined as we further review and refine our data.

Over 50% of our supplier population is located in five countries including:

- United States
- United Kingdom
- Canada
- Australia
- Netherlands

Progress in 2021 will include further reviewing our supplier population.

## Australian Operations

Our Australian entities listed below undertake aviation ground handling services, lounge and cargo services at ten airport locations across Australia and are supported by approximately 2,000 dedicated and highly skilled employees.

	Employees	Contract Resource
Brisbane	300	52
Sydney	603	0
Adelaide	57	0
Cairns	21	53
OOL	5	0
Melbourne	438	46
Northern Territory	61	4
Western Australia	246	90
Totals	1731	245
Grand Total		1,976

Figures correct July 2021

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

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.

## Modern Slavery Risk Assessment and Mitigation

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) 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 including Transparency International, the UN Global Compact and the TRACE matrix, which provides an indication of corruption perceptions.

We monitor the risk of modern slavery within our overall approach to identifying risks across our business. 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.

We have many new activities planned for both 2021 and 2022 in this area, which will introduce significant procedural changes and improvements in our approach to supplier assessments.

## Risks of Modern Slavery Practices

As identified in our last report, we understand that there are risks of modern slavery practices occurring within our business, supply chains and operations. Identification of risks is done through understanding our operations, the geographies in which we operate and our supply chain, as well as understanding external social factors of where such risks are most likely to occur.

We have reviewed our risks based on our assessment in our last report, of the risks of modern slavery practices that could arise in relation to our operations, as well as our supply chains. We have also set out some of the measures we have taken and continue to take to address those risks.

Whilst the risks have not significantly changed in 2020, as our business grows and expands into new geographies we have added one new potential issue in relation to onboarding employees who join us through acquisition or partnership with other companies. We will continue to assess these risks and ensure we implement our policies, procedures, controls as well as any enhanced requirements, to mitigate any new or increased risks we identify.

Modern Slavery Risk	Potential Issues	Actions Taken to Assess and Address Risks
<b>Directly employed staff</b>	<p>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.</p> <p>Onboarding new employees from business we partner with or acquire.</p>	<p>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.</p> <p>Ensure all new employees that join our Group are onboarded and inducted properly, including understanding our policies, procedures and Code of Conduct, as well as understanding how they can raise any concerns confidentially and anonymously through our SpeakUp solution.</p>
<b>Labour providers and service providers</b>	<p>Engaging with labour providers who are themselves engaging in modern slavery, including, underpaying staff wages and employee entitlements.</p> <p>Employee misclassification.</p>	<p>Detailed analysis and reporting on our supplier population by category, geography and analysis of risks supported by our new system.</p> <p>Engage more fully with our suppliers through our new onboarding system and processes.</p> <p>Improved supplier due diligence and assessments.</p> <p>Issue an updated Third Party Code of Conduct.</p> <p>We also assess whether the contractor may themselves have Modern Slavery reporting obligations, which we can review.</p>
<b>Suppliers</b>	<p>Engaging with suppliers who are engaging in modern slavery practices including, underpaying staff wages and employee entitlements or engaging in human trafficking.</p>	<p>We set out our actions in relation to suppliers below.</p>
<b>Indirect risks within our supply chain</b>	<p>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.</p>	<p>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.</p>

## 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.

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).

Our plans to identify options and select a new system for Business Partner Onboarding and Monitoring have been impacted by Covid-19 while resources were required to be refocused for a period of time. We are now back underway with this work and expect to have selected a new system solution by end 2021 and to implement this solution and new supporting procedures, risk assessments and controls in 2022 for roll out globally across our Group. This will ensure consistency, quality and transparency across our whole Supplier population and better assist us in our ongoing monitoring activities and analysis.

Our due diligence of new joint venture partners or companies we acquire is a robust and mature process and includes an assessment of modern slavery risk in addition to all other aspects of due diligence, to ensure we understand business risks and practices. Our integration activities ensure that our policies and training are implemented within any new operations and expectations are clear for all new partner and employees.

Our Third Party Code of Conduct forms part of all new Supplier contractual arrangements and we actively ensure it is included in any contract renewal processes for existing Suppliers. The 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. Aligned with our plans to select a new system solution for Business Partner Onboarding and Monitoring and accompanying procedures, we intend updating and re-issuing our Third Party Code of Conduct to our global supplier population.

Our current Third Party Code of Conduct is available to view at: <http://www.johnmenziesplc.com/third-party-code-of-conduct/>.

## Policies, Procedures and Compliance

Our approach and response to Modern Slavery forms part of our approach to protecting human rights within our **Group Sustainability Programme** as well as our **Group Compliance Programme**, both of which have the full support of our John Menzies plc Board and apply group-wide including all our Subsidiaries. The ultimate responsibility is owned by our John Menzies plc Director of Corporate Affairs.

Our Group Compliance Programme is assessed regularly to ensure it continues to be fit for purpose and that it evolves and improves in line with changing legislation, business priorities and risk areas, as well as the changing expectations of our stakeholders. Our programme contains key policies, procedures, training and controls to ensure it is effective in meeting these requirements and ensuring our compliance with legislation and ethical conduct.

Our Sustainability Programme sets goals and commitments across environmental, social and governance topics that are material for our Group. This includes goals that focus on ensuring our supply chain is sustainable, ethical and that we engage and do business with partners that adhere to those same values. Developing our processes, policies and implementing our new Business Partner Onboarding solution are key areas of focus for us in 2021 and 2022.

Our Code of Conduct remains at the heart of our suite of ethical and legal policies and was updated at the end of 2020 to ensure it remains up to date and reflective of the changes that matter for our business, legislatively, socially and culturally. 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 and what they can expect in return as an employee. It acknowledges the rights of our people to engage in collective bargaining as well as other areas relating to protecting their rights. It also covers key areas of ethics and compliance, including modern slavery and human trafficking, human rights, equality, diversity and inclusion, and anti-bribery and corruption amongst many other topics.

In addition to our general handbooks and manuals, and Code of Conduct, we have many dedicated key policies and training modules implemented group-wide including: Anti-Slavery and Human Trafficking, Anti-Bribery and Anti-Corruption, Equality, Diversity and Inclusion, and SpeakUp to name a small few.

## Grievance and Remediation

We offer many channels for seeking guidance, reporting concerns and raising grievances including our independent whistleblowing hotline, which we have had in place across our global network since 2016. At the end of 2020, we replaced our existing whistleblowing hotline with a new service called 'SpeakUp' and have since launched a new SpeakUp Policy to accompany this which replaces our previous Whistleblowing Policy and offers clear guidance and support on when and how to make a report, and how it will be treated and investigated. We adhere to all applicable legislation in relation to whistleblowing and our own policy standards protect the rights of those making reports in good faith.

Our SpeakUp service offers reporters the ability to raise any issues or concerns anonymously and confidentially around unethical conduct, malpractice, illegal acts or failures, including human rights' violations such as slavery or human trafficking. We encourage everyone working with us and on our behalf to use the service in confidence and that their concern will always be taken seriously, treated confidentially and fully investigated. Our new service allows us to engage with a reporter via the SpeakUp system without them having to disclose their contact details or identity, enabling us to better investigate any reports made and confirm back to reporters when investigations are concluded. Although this report covers our financial year 2020, we can confirm that in early 2021, we have already experienced an increase in reports, which we expect is partly due to increased awareness. This gives us confidence that our communications are effective, more people are aware of the facility and feel comfortable making a report. We have more work to build confidence and ensure that our people feel comfortable reporting via other channels for less serious concerns or grievances and that they receive the same standards of feedback.

Our SpeakUp service now also offers separate contact details for third parties to report any serious issues or concerns related to our business any issues or concerns Reports can be made anonymously, are always treated confidentially and will be fully investigated and, where required, remedial action will be taken.

The safety of our people and our operations is critical and as such, we mandate that all health, safety and security issues, concerns or incidents be reported via our safety management systems to ensure they are communicated, responded to and remediated appropriately. SpeakUp can still be used for anyone who wishes to report a concern or issue in this area anonymously.

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.

## Training

We provide an Anti-Slavery and Human Trafficking Awareness e-learning module to all Group employees, which was initially launched in 2019 and is 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.

During 2020 we developed a new Code of Conduct e-learning module, which was launched in early 2021 for all Group employees. This e-learning is designed to ensure all our employees have a good awareness and understanding of ethical conduct as well as core policies, procedures, legal obligations and the behaviours we expect of them. This new module also includes appropriate reference to and reinforcement of our zero-tolerance position on modern slavery and human trafficking. As with all our compliance-related training, it has been made available in a number of languages to ensure it is as accessible as possible for all our employees.

We have an action to review our training suite in early 2022, to ensure this remains fit for purpose, however, we already intend reviewing the face-to-face training we provide to our senior teams and our joint venture partners. Face-to-face training aims to provide greater awareness of key compliance topics our senior teams or particular roles may be more exposed to, including modern slavery but with a key focus on anti-bribery and anti-corruption. At the same time as we intend implementing a new Business Partner Onboarding system, we plan to introduce more supply chain and procurement focused training for appropriate roles, incorporate a modern slavery element, to our suite of learning. This will better equip our teams with the knowledge and skills to support them in following our supplier onboarding procedures and identify any compliance-related concerns, particularly as we make procedural and system changes in this area.

## Measuring Performance

We measure and report internally on completion of our training modules including our Modern Slavery Awareness and Code of Conduct e-learning, 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 8 Pillar Audit Programme and associated documentation takes into account the provisions for assessing awareness and accessibility of our Code of Conduct and Anti-Slavery and Human Trafficking policies, together with our Third Party Code of Conduct at each location. It also checks local awareness and promotion of our SpeakUp solution. 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.

We did not identify any International Labour Organization (ILO) indicators of modern slavery anywhere in our operations during 2020.

## Covid-19 Impact

Covid-19 continued to have a significant impact on our operations throughout 2020. This resulted in an increased focus on our supplier and customer populations. An updated supplier due diligence questionnaire was made available and there was a renewed recognition that a new more robust risk-assessment process for suppliers was required. Activities in this area had previously been postponed, again due to the impact of Covid-19 requiring resources to be focused elsewhere.

## Key Areas of Action 2021/2022

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.

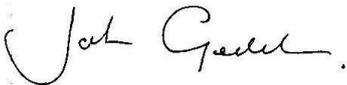
We commit to continuing to keep the Group's supply chains under review to identify and monitor ongoing and future risks.

We have provided an update on progress to date and identified new key areas of action to be delivered 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:

Action	2021 Steps	2022 Steps
<b>Continue to develop and expand our Supplier due diligence and Business Partner onboarding procedures and seek to implement a new systems solution.</b>	Review options and select a new system platform to manage our business partners, onboarding and due diligence.	Implement and roll out a new system solution and accompanying procedures and guidance for undertaking Business Partner onboarding and due diligence.
<b>Develop increased transparency on the geographical spread and categorisation of our Supplier population and deeper analysis across the tiers.</b>	Build on the work undertaken in 2020 to identify high level geographical splits.	Detailed analysis and reporting on our supplier population by category, geography and analysis of risks supported by our new system.
<b>Seek new opportunities and ways to better collaborate with our business and industry partners that help us build on best practice and incorporate learnings.</b>	Seek engagement and understand what our partners and customers are developing in this space.	Engage more fully with our suppliers through our new onboarding system and processed.  Improved supplier due diligence and assessments.

		Issue an updated Third Party Code of Conduct that matches.
<b>Continue to develop and create awareness of modern slavery and other human rights risks across our Group.</b>	Understand new ways we can improve our support of human rights more fully within the Group and our supply chains, through our commitments and learnings as a signatory of the UN Global Compact.	Implement new actions to support human rights more fully within the Group and supply chains.

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.



July 2021  
**John Geddes**  
**Director of Corporate Affairs & Group Company Secretary**  
**John Menzies plc**

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July 2021  
**Darren Masters**  
**Director**  
**MA (Holdings) Australia Pty Ltd**



July 2021  
**Alistair Reid**  
**EVP Oceania and South East Asia**  
**Menzies Aviation (Ground Services) Australia Pty Ltd**