



MENZIES
AVIATION

Anti-Slavery and Human Trafficking Statement 2021

30.06.2022

Prepared by: John Menzies plc

People. Passion. Pride. Since 1833.

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 2021 – our third under the Australian Act. It details our approach and 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 operations.

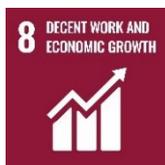
An Ethical Approach

Modern slavery can take many forms of human rights abuses and exploitative practices, examples of which include human trafficking, forced or compulsory labour, child labour, slavery and servitude, debt bondage, full or partial restrictions on freedom of movement, withholding and non-payment of wages and induced indebtedness.

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 operations and in our approach to tackling modern slavery throughout our supply chains.

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

The Company is a signatory of the United Nations Global Compact and member of the UK Global Compact Network. As a company, we are 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 will continue to evolve our approach, goals and initiatives for advancing the UN Sustainable Development Goals (SDGs) and provide transparency in our reporting and communications. Our first communication on progress report for the UN SDGs and UN Global Compact more generally, will be published end July 2022. This will include progress against goals 5 Gender Equality and 8 Decent Work and Economic Growth, which specifically relate to tackling modern slavery and human trafficking.



SDG Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

Our own ‘All In’ sustainability strategy was introduced Company-wide in 2021. It outlines our priorities, actions and initial targets set for the most material issues across the Environmental, Social and Governance spectrum, and is fully integrated into our approach to strategy, risk, governance and ethical conduct.

Targets and initiatives aimed at supporting human rights are captured in our ‘People’ and ‘Safety’ pillars, and more specifically for modern slavery under our ‘Legal and Ethical’ pillar, where targets include:

- Zero tolerance to unethical behaviour
- Ethical supply chain



Consultation

As in previous years, this joint Statement was prepared in consultation with stakeholders from the Company and each of the qualifying Subsidiaries. This involved directly liaising with them on specific factors affecting their businesses, supply chains and the geographies they operate and includes consultation with our Australian entities specified in scope for the purposes of this Statement.

In addition to the consultation process to develop this joint Statement, we also work closely with entities and colleagues across



the Company, its Subsidiaries (both in scope for this Statement and more widely) and joint ventures on an ongoing basis to implement and monitor our modern slavery risk management approach, including through our supply chain assurance activity. Supply chain assurance is a particular area of focus and change across the organization and will be further discussed later in this Statement.

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. Approval and sign off is provided by the relevant Director's of the Company and its qualifying subsidiaries at the end 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 38 countries, supported by a global team of approximately 30,000 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 airline customers to deliver their goals safely and securely.

Core Services & Customers

Ground Services

We offer the full range of ground services including passenger check-in, customer relations, VIP meet and greet, executive lounges, full ramp handling, baggage sorting, loading and tracing, de-icing services, cabin cleaning and presentation, asset maintenance and aircraft washing.

We support zero emissions aircraft turns in some locations and collaborate with customers to achieve their sustainability goals as we work towards becoming carbon neutral by 2033 and a leading provider of sustainable ground service solutions.

Fuel Services

We are the world's largest independent provider of aviation fuel services, providing fuel storage management and into-plane fuelling services on four continents. Our customer portfolio includes the world's largest fuel suppliers, airlines, and airports.

We deliver bespoke commercial models, best suited to our customers' needs and encompassed by robust KPIs to drive our performance. With a hands-on leadership team, our commitment to innovate underpins our growth.

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 network.

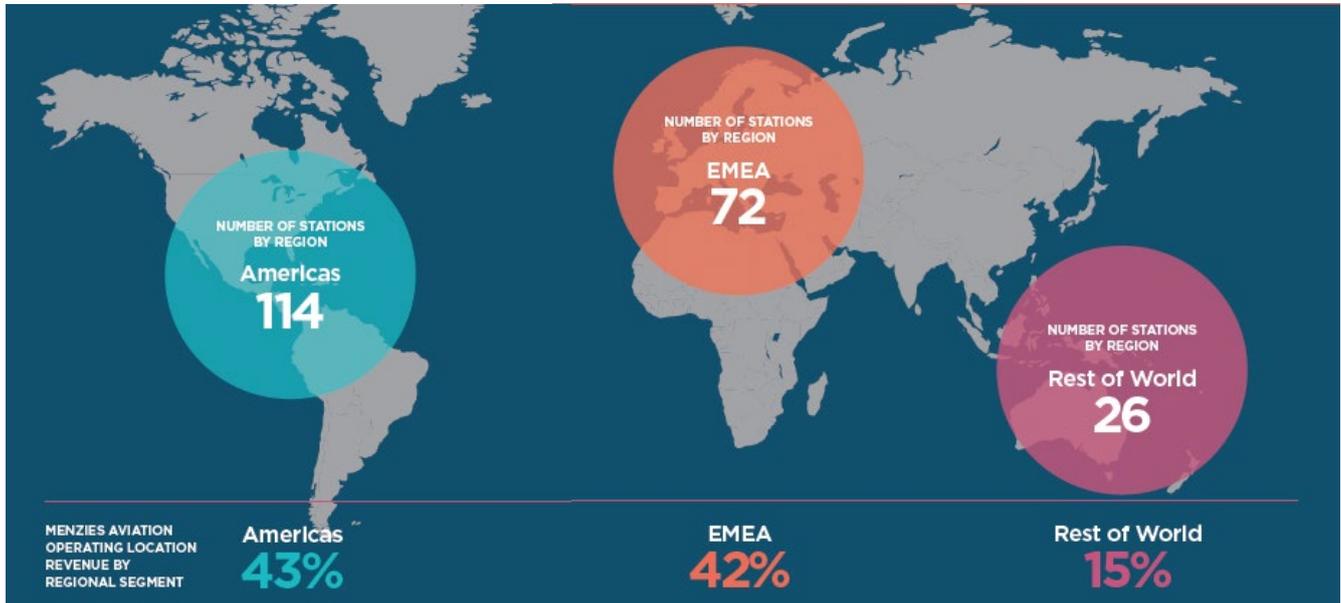
Within our cargo forwarding business, Air Menzies International, we are a neutral consolidator of air cargo, providing wholesale airfreight and express services exclusively to freight forwarders, packaging companies, customs brokers and courier agents.

Menzies Aviation provides services to over 500 customers globally including Air France-KLM, American Airlines, Cathay Pacific, easyJet, Frontier Airlines, IAG, Norwegian, Qantas Group, Qatar Airways and United Airlines. Best in class safety and security is the number one priority each day and every day.



Structure

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.



As at 31.12.2021

2021 At a Glance

38	➤	countries
27k	➤	employees
58	➤	cargo centres
24	➤	forwarding depots
212	➤	ground service airports
1.7m	➤	air cargo tonnes
2.5m	➤	fuelling turns
0.6m	➤	ground service turns

In 2021, Menzies Aviation handled 614k aircraft turns, 1.7 million tonnes of cargo and fuelled 27 billion litres of fuel, despite ongoing impacts on the aviation industry from the global Covid-19 pandemic.

Our operations are supported by a number of business functions including finance, IT, legal and compliance, HR, commercial, insurance, safety and security, and sustainability. We have office locations around the globe, many in airports, in addition to our Edinburgh headquarters and regional offices.

At the end of 2021 we had some 27,000+ employees, which has increased to approximately 30,000 employees as of end June 2022. Our employees are further supported by agency workers in many of the locations we operate in.

Recruitment, training and the support of our agency partners has been increasingly important over the last number of months as we scale up our operations in line with increasing flight volumes and passenger numbers increase, particularly in some geographies as the restrictions and impacts of the Covid-19 pandemic reduce.

Further details of our business can be viewed in our Annual Report and Accounts 2021: <https://menziesaviation.com/wp-content/uploads/2022/04/John-Menzies-plc-2021-Annual-Report-and-Accounts.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. During 2021 we undertook additional analysis of our supplier population, focusing on our top suppliers in each region. As we implement a new business partner onboarding solution in 2022, our supply chain analysis will be further refined. Our top suppliers globally



are focused on ground service equipment, IT solutions and infrastructure, labour providers and professional services.

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

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

Within Australian, our main suppliers include, but are not limited to: Cabin Services Australia who provide aircraft cabin cleaning services; OCS who provide wheel-chair services; Blue Collar Recruitment who are an aviation services labour provider; Wymap Group who provide labour and trucking solutions; our uniform, ground services equipment providers are also significant. We also rely on many third parties for IT services, office supplies and office cleaning. We had an increased level of engagement with labour providers during 2021 and into 2022 as we responded to the impacts of Covid and the need for additional support as we won new business contracts and flight volumes have slowly increased. We only use trusted partners for this type of labour support, many of whom will become direct employees.

In 2021 we selected a new business partner onboarding system solution and engaged Deloitte to assist in the development and implementation of our new solution and new third party questionnaires and due diligence procedures. This will provide a robust and fully rounded solution across all aspects of supplier onboarding, and improved insight. Further details are outlined within the Due Diligence section of this Statement.

Australian Operations

Our Australian entities undertake aviation ground handling services, lounge and cargo services at ten airport locations across Australia and are supported by over 1,900 dedicated and highly skilled people.

In Australia, we offer a variety of landside and airside operational roles and career progression opportunities in areas such as passenger services, ramp services, aircraft turnaround, aircraft cleaning, cargo operations, safety and security.

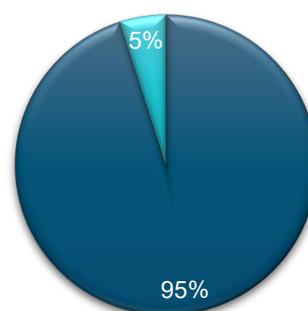
We operate in compliance with all applicable labour legislation in all jurisdictions. Menzies Aviation (Australia) Pty Ltd, Menzies Aviation (Ground Services) Pty Ltd and Australian AirSupport Pty Ltd are all registered labour hire providers in Victoria, Australia, in accordance with local legislation.

Our Australian entities in scope for this report

- 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

Location	Employees	Contract Resource
Brisbane	277	37
Sydney	522	50
Adelaide	48	0
Cairns	83	34
OOL	6	3
Melbourne	403	9
Northern Territory	82	23
Western Australia	209	117
WTB	2	2
Total	1632	275
Grand Total	1907	

Australia Employee Population by Role Type



■ Operational Roles ■ Office Roles

Figures correct July 2022



Modern Slavery Risk Management Framework

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 within our Operations and Supply Chains

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 2021 we have recognized a heightened risk where we engage labour through agency arrangements, particularly where those resources are engaged on a temporary basis as opposed to becoming our own permanent employees. We are also mindful of the conflict in Ukraine and the potential risk that brings with displacement and vulnerability of persons affected by it. We have monitored our business and recruitment in this regard and set up a dedicated internal contact point for Ukrainian nationals seeking work.

While we identify a potential risk in our own employee populations where we are directly recruiting employees, we believe this to be negligible. We have robust recruitment processes and onboarding procedures in place and always respect the rights of employees, including the right of freedom of association and collective bargaining. As our business grows and expands into new geographies, we will continue to assess these risks and ensure our policies, procedures and controls remain valid and effective to mitigate any new or increased risks we identify.



Modern Slavery Risk	Potential Issues	Actions Taken to Assess and Address Risks
Directly employed staff	<p>Low risk.</p> <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 businesses 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>
Labour providers and service providers	<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 including assessment of whether provider may themselves have Modern Slavery reporting obligations, which we can review.</p> <p>Ensure awareness of our Third Party Code of Conduct and the obligations on our suppliers.</p> <p>Potential for undertaking our own or requesting independent audits.</p>
Suppliers	<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>
Indirect risks within our supply chain	<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>

Actions for Managing and Mitigating Modern Slavery Risks

Contractual Controls and Due Diligence

Our zero-tolerance position in relation to slavery and human trafficking is evidenced a number of ways through our controls and procedures.



1. Through the incorporation of suitable provisions within our Supplier contracts relating specifically to modern slavery as well as our Third Party Code of Conduct more generally. We review 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.

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. 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/>.

2. 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).

In 2021, we selected a new system solution for Third Party Risk Management/Business Partner Onboarding and Monitoring. We now have a project actively underway with the support of Deloitte to implement this solution and new supporting procedures, risk assessments and controls, including a specific focus on human rights, labour and modern slavery risks. This will be ready by end Q3 2022 and rolled out globally by end 2022. 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.

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. As reported last year, developing our processes, policies and implementing our new Business Partner Onboarding solution were key areas of focus for us in 2021 and into 2022.

Our Code of Conduct remains at the heart of our suite of ethical and legal policies and is updated regularly 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. Our current whistleblowing hotline service is called 'SpeakUp'. 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 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.

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

Our SpeakUp Policy and Guidance document was updated for the start of 2021 and offers clear guidance and support on when and how to make a report, how it will be treated and investigated, and how and when a reporter will be informed of an outcome. 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.

We experienced a large increase in reports following our recommunication of the process and SpeakUp facility in 2021 and continuing into 2022, which is very positive. The increased awareness is making a difference and we gives us confidence that our communications are effective, more people feel comfortable making a report and we gain greater insight into employee concerns and relations. The vast majority of reports focus on concerns or grievances of some form. We have not received any reports in relation to modern slavery or human trafficking.

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. This process will be revised in 2022 as we implement our new Third Party Risk Management system. We are fully committed to conducting the appropriate investigations and taking the necessary actions should evidence of modern slavery ever be identified.

Should any issues be 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 have been providing Anti-Slavery and Human Trafficking Awareness e-learning to all Group employees since 2019. 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. This has recently been reviewed and integrated into our induction learning for all employees, rather than a standalone module.

Our Code of Conduct e-learning module, which was launched in early 2021 for all Group employees, is designed to provide all our employees with a good awareness and understanding of ethical conduct as well as core policies, procedures, legal obligations, and the behaviours we expect of them. This 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 are further developing our training and guidance in 2022, aligned with the implementation of our new company-wide Business Partner Onboarding system. This will include role-specific training and procedural guidance around modern slavery-related supplier due diligence (as well as all other aspects of supplier due diligence) to better equip our teams with the knowledge and skills to identify and report any concerns in this area.



CASE STUDY

In October 2021, our Menzies team in Johannesburg participated in a Human Trafficking and Modern Slavery Campaign, hosted by the South African police, with attendance and contributions from the heads of the South African police force and specialised crime units, selected airport stakeholders including some airlines, and both local and international NGOs.

The aim of the campaign was to educate both the airport community and citizens on the realities and horrors of human trafficking and slavery. Various speakers impressed the importance of each stakeholder's awareness of the issue within their own environments, signs to look for and how we can all work together against human trafficking and slavery.

Menzies South Africa has pledged to continue to partner with all key stakeholders, identifying and improving strategies for combating these crimes in the ongoing struggle against human rights.



Measuring Performance

We recognise that implementing meaningful and robust measures such as KPIs, internal and external audits, and regularly reviewing and making improvements to our processes and controls will provide a level of confidence in how well we are addressing modern slavery risks and how effective our existing processes and controls are at ensuring no modern slavery occurs anywhere in our business or supply chains. This is an area we must continue to improve on, particularly as we adapt our processes and controls and as the risks of modern slavery occurring evolve.

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 2021.

Key Areas of Action 2022/2023

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	2022 Steps	2023 Steps
<p>Continue to develop and expand our Supplier due diligence and Business Partner onboarding procedures and seek to implement a new systems solution.</p>	<p>Complete the implementation and roll out of our new Third Party Risk Management/Business Partner Onboarding solution. Updated procedures and guidance will be implemented to accompany this. The new solution offers direct engagement with our suppliers, who will be asked to complete our new assessments.</p>	<p>Review the effectiveness of our new solution and adapt as required. Review monitoring of suppliers via our new solution.</p>
<p>Develop increased transparency on the geographical spread and categorisation of our Supplier population and deeper analysis across the tiers.</p>	<p>Build on our more indepth analysis carried out on our top suppliers in 2021 to expand this across our entire population with greater insight on risk levels and geographical splits.</p>	<p>Further detailed analysis and reporting on our supplier population by category, geography and analysis of risks supported by our new system.</p>
<p>Seek new opportunities and ways to better collaborate with our business and industry partners that help us build on best practice and incorporate learnings.</p>	<p>Seek more engagement opportunities similar to our teams in Johannesburg and understand what our partners and customers are developing in this space.</p>	<p>Review the need to provide learning and support to our supplier population in this area.</p>
<p>Continue to develop and create awareness of modern slavery and other human rights risks across our Group.</p>	<p>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.</p>	<p>Implement new actions to support human rights more fully within the Group and supply chains.</p>



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.



30th June 2022
John Geddes
Director of Corporate Affairs & Group Company Secretary
John Menzies plc



30th June 2022
Darren Masters
Director
MA (Holdings) Australia Pty Ltd



30th June 2022
Alistair Reid
EVP Oceania and South East Asia
Menzies Aviation (Ground Services) Australia Pty Ltd

