

Ethics

Ensuring we conduct ourselves and our business activities ethically at all times, keeps our business safe, our people safe and helps us play our part in supporting a fair and just society and creating an ethical culture. As such, Ethics is a core pillar of our All In plan.

Our approach to ethical conduct is underpinned by our values, behaviours and the policies, training, controls and governance we abide by throughout our global operations. Menzies ethical approach is being adopted by National Aviation Services (NAS) as a key part of the business integration.

UN SDG Alignment



OUR ETHICAL GOALS

Anti-bribery and corruption

Zero tolerance for all forms of bribery and corruption within our business and supply chains.

Fully compliant

Operating in full compliance with applicable legislation, ensuring strong ethical and governance practices are up to date, relevant and adhered to.

Cyber security

Ensuring continuous improvement of the confidentiality, integrity and availability of Menzies systems, data and services.

Ethical supply chain

Ensuring sustainable and ethical supply chains and partnerships everywhere we operate.



Speak Up

Our confidential and independent Speak Up hotline enables employees and third parties to report any instances of unethical conduct via phone or online, in their local language, and without fear of reprisal. All reports are treated seriously, confidentially and investigated appropriately in line with published procedures and service levels. We can communicate confidentially with reporters via the SpeakUp platform without compromising anonymity where this should be preserved. All reporters are also provided with a recorded outcome and resolution to their report.

Cyber Security

The potential risk from 'Cyber' continues to grow. As part of a critical supply chain, depended upon by our customers and the wider public, we take this seriously ensuring we have appropriate controls in place. A risk-based approach is followed to understand the continually changing threats and vulnerabilities that could impact what we do. This drives the continual investment in our cyber

security programme with the key aims of, keeping the information we are trusted with secure and our business processes robust. Our formal cyber programme follows a best practice framework designed to mitigate the risks to an appropriate level.

During 2022 we improved the training, awareness and cyber reporting for our employees, rolled out new technologies to improve the management of vulnerabilities and to proactively detect malicious activity in our IT environment. This approach to managing the business risk from cyber will drive the continuous improvement of our cyber security risk posture.

Tax Strategy

As a good corporate citizen, Menzies is committed to being a responsible and transparent tax payer, paying the right amount of tax in accordance with the laws and regulations of the countries in which we operate.

Ethics continued



TRACE is a non-profit business association dedicated to anti-bribery, compliance and good governance. TRACE helps multinational companies conduct business ethically and in compliance with the U.S. Foreign Corrupt Practices Act, UK Bribery Act and other similar anti-bribery legislation.

www.traceinternational.org

We monitor and investigate any and all reports or suggestions of corruption within our operations. We took action on one localised report of unethical business practices in 2022.

Zero tolerance bribery and corruption

We have been a member of TRACE for many years, supporting our zero-tolerance approach to bribery and corruption. We use TRACE best practices, training courses and risk matrix data to support our own internal processes, including providing regular specialist training on bribery, corruption, fraud and conflicts of interest for higher risk employee groups and senior employees, including those at executive level.

Due diligence & Business Partner Engagement

With support from Deloitte, we implemented a new Third Party Risk Management system that utilises third party database information as well as data provided directly from our supplier population. Our new system, procedures and policies, including an updated Third Party Risk Management policy, are being rolled out globally. The initial focus is on our global supplier population and enables us to better engage with our suppliers, undertake auditable risk

assessments and due diligence across ESG criteria, and will support our scope 3 emissions analysis and progress towards achieving new science based emissions reduction targets.

We already build contractual provisions for ethical and compliance topics such as modern slavery and anti-bribery and anti-corruption into our contractual arrangements, along with our Third Party Code of Conduct, but our new system and procedures significantly enhance our supplier due diligence and onboarding processes and will help progress a number or priority goals and metrics in our All In plan.

We also have a robust due diligence process for onboarding new joint venture partners and engage external expertise to undertake due diligence on our behalf, where required.

Our new Third Party Risk Management system will support onboarding all types of third party business partners in future.

Policies, training and communication

Our Code of Conduct lays the foundation for all full suite of ethics and compliance-related policies. We regular review our policies and aim to make them understandable and accessible, translating them into multiple languages aligned to the geographies we operate in.

We communicate policies, learning, guidance and regular updates for every area of our ethics wheel, as well as our wider All In plan.

The level and method of learning varies by role and reaches every level of our business including our executive teams, on topics including but not limited to, Code of Conduct, anti-bribery and anti-corruption, modern slavery and human trafficking, conflicts of interest, cyber security, data protection and privacy. Our Code of Conduct learning is undertaken by every new employee globally and all existing employees on a regular basis, and provides a basic awareness of all the topics, as well as other



areas covered in our All In plan such as safety and environment. More detailed training also exists for these topics.

We communicate in a number of ways including e-learning, 'face to face' training, newsletters and alert updates, through Microsoft Teams, posters, and more. We always look to improve engagement, check awareness and communication, and ensure clear messages come from our executive and senior leadership teams, setting the tone and leading by example.

2022 deliverables

- Rolled out Speak Up to all NAS locations.
- Completed an independent evaluation of our global sanctions programme.
- New cyber training rolled out.
- New Third Party Risk Management system and ESG due diligence.
- Review of our fair labour and modern slavery programme.

2023 priorities

- Adopt recommendations to further improve our global sanctions programme.
- Roll out improvements and measures for our fair labour and modern slavery programme and new KPIs.
- Fully embed our Third Party Risk Management system for suppliers and expand scope to other business.
- Renew and our Code of Conduct learning and communications partners.

CASE STUDY

Developing an ethical culture

By making compliance part of our everyday conversations and working practices in a real way, we aim to increase awareness, understanding and practical application at all levels. Our Code of Conduct and training gives every employee knowledge of how to navigate difficult situations, associated legal and ethical implications, and guidance on making the right decisions. Our specialised policies, processes and training further support employees whose roles expose them to greater risk areas, for example, bribery, corruption, fraud, fair labour, data protection and more. At the highest level, our ethical approach is shaped by the strong example set by our most senior leaders, and the expectations they have for our business, employees and partnerships. All of these actions have helped to develop our ethical culture, and its importance is acknowledged by the inclusion of the Ethical pillar in our All In plan, our third party commitments, and partnerships.

We gauge and measure this through:

- Employee engagement and requests for guidance received from across our global business
- Queries received via SpeakUp and improvements we identify
- Training compliance
- Due diligence
- Internal and external audits

100%

of suppliers assessed for modern slavery risk in 2023