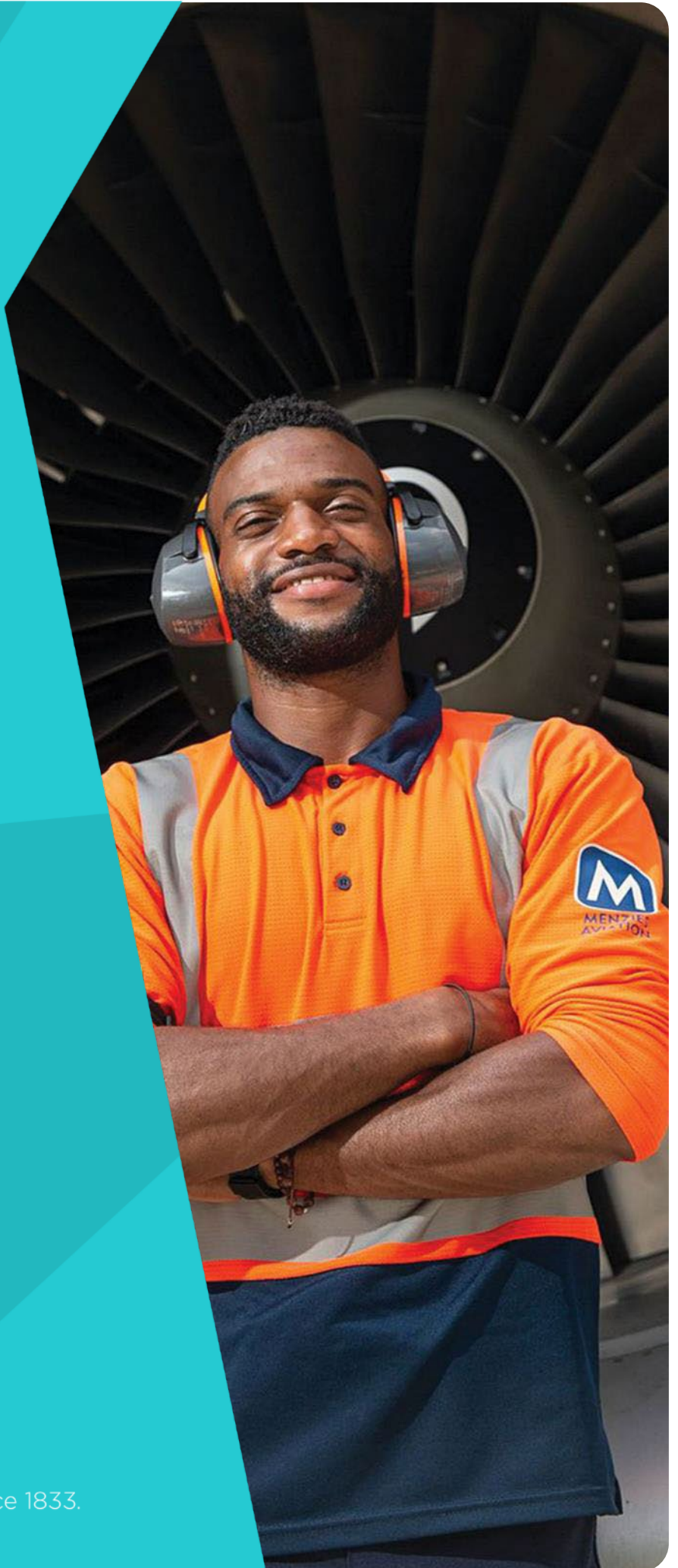




Third Party Code of Conduct

August 2024

People. Passion. Pride. Since 1833.



Our Third Party Code of Conduct

This Third Party Code of Conduct is for John Menzies Ltd and all Group subsidiaries and sister companies such as Air Menzies International and National Aviation Services, along with our majority joint venture partners where we have a majority shareholding or operational control (together 'Menzies').

Menzies is committed to conducting business fairly, honestly, transparently and safely, and in compliance with all applicable laws, regulations and ethical standards (legislation).

As such, we are committed to working only with customers, suppliers, contractors, sub-contractors, consultants, agents, joint venture partners and other third parties (our Business Partners) whose business ethics and behaviours align with those of Menzies. We seek to avoid doing business with individuals or organisations who do not subscribe to equivalent standards.

This Third Party Code of Conduct (the Code) outlines the values, ethics and behaviours we expect from our Business Partners and reflects Menzies' own internal Code of Conduct. It applies to all external individuals and organisations Menzies engages in business with.

We expect our Business Partners to ensure that this Code is communicated to relevant individuals within their organisation and is also made available to any Business Partners they engage to undertake work for us on our behalf.

We expect our Business Partners to confirm that relevant key management contacts have read and understood this Code and agree to follow it in all dealings with us or on our behalf.

We expect you, as our Business Partner, to share and promote our commitment to comply with the following values and standards to the extent they are applicable to our business relationship.

Compliance with Laws

We expect our Business Partners to comply with both this Code and the legislation applicable to the goods and/or services being provided throughout our business relationship. Customs or local practices must never take precedence over such legislation or this Code. Where this Code sets a higher standard than, but does not conflict with, applicable legislation, this Code should be followed. Where applicable legislation sets a higher standard, then that legislation should be followed. If you find this Code conflicts with applicable legislation, you should notify us immediately.

We adhere to, and expect our Business Partners to adhere to, the principles of the UN Global Compact, the UN Guidelines on Business and Human Rights and the fundamental principles of the International Labour Organisation (ILO).



People

Our People are our most highly valued resource. We actively promote diversity at every level of our business and, as a global organisation, aim for a workforce that is representative of the societies in which we operate. We seek to create a working environment in which inclusion and acceptance are the norm and where mutual trust and respect are encouraged.

All individuals should receive equitable treatment and access to resources, opportunities and services regardless of their origin or status. We recognise and respect the cultural heritage and traditions of Indigenous Peoples and believe Indigenous Peoples have the right to participate in decisions affecting their lives. Refugees and migrants have the right to safety and protection from harm, including physical and psychological abuse. We will take

All individuals should receive equitable treatment and access to resources, opportunities and services regardless of their origin or status. We advocate for the rights of refugees, migrants and Indigenous Peoples and aim to empower these individuals by supporting initiatives that promote their rights and development. We recognise and respect the cultural heritage and traditions of Indigenous Peoples and believe Indigenous Peoples have the right to participate in decisions affecting their lives. We support the integration of refugees and migrants into society, and believe refugees, migrants and Indigenous Peoples all have the right to safety and protection from harm, including physical and psychological abuse. We take all necessary steps to ensure their safety and wellbeing in our operations, and it is vital that our Business Partners treat refugees, migrants and Indigenous Peoples with the same respect.

Supporting the communities where we operate and where our people live is also important to us, and we aim to create valued partnerships and support projects that help benefit local communities, reduce climate impacts and reduce inequalities. We therefore encourage our Business Partners to support local community groups and charities that matter to them.

Per the aims of the ILO, John Menzies Ltd is committed to promoting fair labour and human rights, and ensuring we comply with all relevant legislation.

We respect our employees' right to freedom of association and take a zero-tolerance approach to any form of modern slavery in our operations and supply chain, including, without limitation, human trafficking or child labour.

Menzies is proud to be a signatory of the United Nations (UN) Global Compact and we remain committed to upholding its 10 principles. For Human Rights and Labour, this includes:

[Principle 1](#): Business should support and respect the protection of internationally proclaimed human rights.

[Principle 2](#): Businesses should make sure that they are not complicit in human rights abuses.

[Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

[Principle 4](#): Businesses should uphold the elimination of all forms of forced and compulsory labour.

[Principle 5](#): Businesses should uphold the effective abolition of child labour.



Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

We expect our Business Partners to uphold these same principles by respecting the dignity and human rights of all people, and amongst other things, ensure that:



- There is no forced or compulsory labour, human trafficking, slavery or servitude in your organisation or supply chains.
- No child is subjected to ill treatment, exploitation or child labour by, or on behalf of, your organisation, consistent with the UN Convention on the Rights of the Child.
- You meet or exceed all applicable national legislation and mandatory or generally accepted industry standards regarding working hours, overtime, wages and benefits.
- You promote an inclusive workplace, one which is free from harassment, intimidation and discrimination on the grounds of race, nationality, religion, gender identity, age, sexual orientation, marital status, disability or any other characteristics protected by applicable Legislation.
- Abuse, in whatever form, is not tolerated.
- You recognise the right of all individuals to freedom of association and to collectively bargain in accordance with applicable legislation.
- You comply with all applicable legislation governing how personal data about any individual is collected, used, managed and transferred between countries and ultimately destroyed.
- You do not employ people younger than 16 years, even where local legislation permits younger children to be employed. Employees under the age of 18 should be restricted in the activities they perform; young employees under the age of 18 should not be employed at night or in hazardous conditions.



Integrity

We aim to work with our Business Partners with honesty and integrity, and we expect them to adhere to business ethics and behaviours consistent with our own. Bribery and corruption damage economic and social development, create an uneven playing field and are illegal under both local and international anti-

bribery and anti-corruption legislation. Menzies has a zero-tolerance policy towards fraud and corruption. It will not be tolerated in any form within Menzies, either directly or through third parties, as we strive to instil the highest ethical standards at all levels of our operations.

We remain committed to upholding the UN Global Compact Principle on anti-corruption:

[Principle 10](#): Businesses should work against corruption in all its forms, including extortion and bribery.

We expect our Business Partners to uphold this principle by having effective policies and procedures in place that seek to prevent the following:

- Bribery, kickbacks, embezzlement, improper payments and corruption, including: (i) the offering of or giving a bribe, whether directly or indirectly, to any individual or entity; (ii) requesting or receiving a bribe, whether directly or indirectly, from any individual or entity; (iii) offering or making facilitation payments to government/public officials.
- Inaccurate, false or misleading reports, records or invoices being issued that could be used to hide corrupt payments.
- Deceptive practices that undermine the trust and integrity of our business relationships.
- Gifts and hospitality being offered, provided or accepted which may improperly influence, or create the appearance of improperly influencing, your business decisions or those of Menzies or other third parties.
- An actual or apparent conflict of interest arising between personal and business interests, including using Menzies' information and resources for improper gains.
- Anti-competitive conduct taking place, including any form of agreement or understanding with competitors to fix prices, rig bids, divide markets, allocate customers or limit supply.
- Involvement in money laundering activities, facilitation of tax evasion or any other financial crime. Our Business Partners must adhere to all applicable laws and regulations related to financial transparency and anti-money laundering efforts, and comply with tax obligations in the countries in which they operate.
- The breach of applicable trade control legislation and/or sanctions within our third party network, ensuring compliance with international trade laws and regulations.

Assets

Menzies' assets, both tangible and intangible and including, without limitation, trade secrets, business information and intellectual property, must only be used for legitimate business purposes and protected from loss, theft or misuse at all times. We consider confidential or commercially sensitive information an important asset and expect our Business Partners to maintain the confidentiality of any business information that is entrusted to you by Menzies or any of our Business Partners.



Subject always to applicable contractual requirements, we expect our Business Partners to:



- Comply with all applicable legislation and adopt accepted industry practice in relation to sharing, protecting and securing information, in particular confidential and commercially sensitive information.
- Destroy any of our business information where there is no longer a contractual business reason or legal requirement to retain it and prevent disclosure of such information unless so authorised.
- Respect the proprietary and intellectual property rights of Menzies and refrain from using Menzies logos or branding unless such use is appropriately authorised.
- Immediately report to us any security incidents, actual or potential, that impact or may impact upon Menzies' information, systems or assets.
- Ensure that no public communications are made concerning Menzies' relationship and/or business dealings unless we have provided the appropriate prior written authorisation.

Health, Safety and Security

Health, Safety and Security are at the heart of our business activities, and we are fully committed to protecting the environments in which we operate, recognising the benefits of being a socially responsible organisation. The stringent management of these areas is embedded within our culture and the way in which we conduct our operations.

We believe that good health, safety, security and environmental (HSSE) practices should be a collective effort and we expect our Business Partners to ensure the rigorous oversight of relevant HSSE considerations through:

- Seeking to protect the health and maintain the safety and security of those that work for and with you, in accordance with applicable legislation, global HSSE regulations and accepted industry practice.
- Ensuring you have effective HSSE policies and procedures in place that your employees are aware of.
- Ensuring that those who work for and with you are adequately trained and provided with the necessary equipment to safely perform their role.
- Recognising that those who work for and with you have a right and an obligation to stop unsafe work.
- Ensuring all individuals (employees, clients and local communities where applicable) have access to clean and safe water, as well as adequate sanitation facilities. This aligns with UN SDG6, which aims to ensure clean water and sanitation is available for all.



Environment & Sustainability

We are committed to complying with all applicable environmental legislation related to our operations and environmental protection. We therefore expect our Business Partners to uphold high sustainability standards and comply with all applicable environmental legislation and regulations and conduct operations in an environmentally responsible manner.

As a signatory of the UN Global Compact, we are committed to upholding its three environmental principles:

[Principle 7](#): Businesses should support a precautionary approach to environmental challenges.

[Principle 8](#): Businesses should undertake initiatives to promote greater environmental responsibility.

[Principle 9](#): Businesses should encourage the development and diffusion of environmentally friendly technologies.

We are embedding sustainability into our strategy, procurement, due diligence and investment decision-making processes and criteria, giving preference to Business Partners that share our commitment to sustainability. We have set ambitious targets to achieve net zero by 2045, and we encourage our Business Partners to set their own sustainability and carbon reduction targets.

Relationships with Business Partners are vital for Menzies' and the aviation industry's net-zero ambitions, so our sustainability commitments will be communicated to all Business Partners at the outset of any business relationship.

All new Business Partners will be subject to due diligence. By collecting information around our Business Partners, we can better understand the activities they carry out and the risks these pose to Menzies, as well as better understand their own sustainability plans. This due diligence may involve the completion of questionnaires related to Environment, Labour, Diversity and Inclusion, and Anti-Bribery and Corruption where necessary. Business Partners will also be required to undertake an ESG risk assessment and sign up to specific contractual revisions, and confirm receipt and acknowledgement of, and certify compliance with, this Code. Our Business Partners will also be required to provide Menzies with emissions data, where requested.

We will continue to always conduct business ethically and with integrity. By adopting high sustainability standards, we can remain resilient and play our part in delivering a sustainable, net-zero future for aviation. We therefore expect all our Business Partners to:

- Understand their emissions and have established long-term sustainability goals and targets, including any policies, measures and controls in place.
- Understand the due diligence process and be aware that they will be subject to environmental risk assessments and risk-based due diligence where this is deemed necessary.
- Provide Menzies with their emissions data where this is requested.
- Comply with Menzies standards by following this Code.

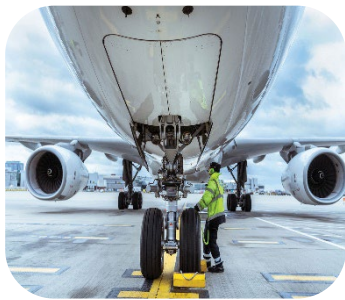


- Adhere to the UN Global Compact and its principles, and to set environmental goals focused on mitigating climate change impacts, such as science based net zero targets.
- Aim to prevent environmental violations within their supply chains through the inclusion of related contractual provisions in all agreements with Business Partners.

Your Compliance

As our Business Partner, it is your responsibility to ensure that all those employed by you, together with Business Partners you engage to undertake work on our behalf, understand and comply with this Code. We expect you to have suitable policies and procedures in place to ensure such compliance. As our Business Partner, you undertake to ensure that the practices and principles outlined in this Code are passed on through your own supply chain and to evaluate your supply chain, as appropriate, to assess and ensure compliance with the principles in this Code.

You must notify us immediately:



- Should you, or any of your Business Partners engaged to work on our behalf, fail to comply with this Code.
- Should you, or any of your Business Partners engaged to work on our behalf, receive notification of any allegation of wrongdoing relating to Menzies business, whether in respect of this Code or otherwise.
- Upon becoming aware of any negative or adverse publicity concerning your business or any product or service you provide to us, or any event or circumstance related to you or your business that could reasonably be expected to cause negative or other adverse publicity for us.

We will not tolerate any retaliation against those who make a report in good faith for alleged wrongdoing, and we expect our Business Partners to adopt a similar approach.

Any non-compliance with this Code must be effectively remedied as soon as is practicable and at no cost to Menzies or our Business Partners.

Failure to adhere to this Code and/or applicable Legislation may be considered a material breach of our agreement with you and considered grounds for us to terminate our business relationship with you without compensation.

We reserve the right to monitor and audit each Business Partner's compliance with this Third Party Code of Conduct. Requests for provision of relevant information to enable us to undertake such audits must be complied with. Business Partners may also be subject to on-site audits.

The standards outlined in this Code will be periodically reviewed to reflect changes to applicable legislation.

Additional Information

This Third Party Code of Conduct is available in additional languages at: <https://www.menziesaviation.com>.

You can find out more about Menzies own approach and plans for operating ethically as part of our 'All In' ESG programme at: <https://menziesaviation.com>.

Any questions or concerns regarding this Third Party Code of Conduct should be directed to Menzies Compliance at: compliance@menziesaviation.com.

Speak Up

Alternatively, you may report any concerns or raise queries confidentially online via our independent SpeakUp solution: <https://menzies.speakup.report/external>

Third Party Code of Conduct			
Date:	Signed by:	Job Role/Position:	Company name:

