



Modern Slavery Statement & Human Rights Due Diligence Report 2024

June 2025

People. Passion. Pride. Since 1833.



Our Statement

1. Introduction

This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “UK Act”), the Australian Modern Slavery Act (Commonwealth) (the “Australian Act”) and the Norwegian Transparency Act (the “Norwegian Act”) (together the “Acts”) and is published on behalf of John Menzies Ltd (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, and Menzies Aviation (Oslo) AS (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 2024.

As required under the various Acts, this Statement details our approach and the steps we have taken to identify and address modern slavery and human trafficking risks, our approach to due diligence, and the steps we have taken to ensure that slavery and human trafficking do not occur in our supply chains or any part of our operations.

This Statement is published on our Menzies Aviation website at <https://menziesaviation.com/> and uploaded to relevant government databases. It provides key stakeholders including the general public access to the key findings from our risk assessments and due diligence, as well as the Company's and Subsidiaries implemented and ongoing efforts to address and combat any actual or potential risks.

2. Consultation

This joint Statement was prepared in consultation with stakeholders from the Company and each of the qualifying Subsidiaries, including our Australian and Norwegian entities. This involved directly liaising with them on specific factors affecting their businesses, supply chains and the geographies they operate in.

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 throughout our operations and to all Subsidiaries regardless of whether they are specifically in scope for compliance with the Acts. All policies, standards and controls must always be followed globally.

Ultimate responsibility for all Subsidiaries rests with our Company Board of Directors. The Board of Directors of John Menzies Ltd as well as 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 Directors of the Company and its qualifying subsidiaries at the end of this Statement.



3. 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.

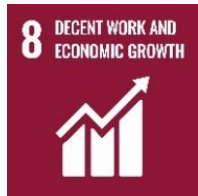
We recognise that modern slavery is a crime and a fundamental violation of human rights. We are committed to ensuring there is transparency in our business operations and in our approach to tackling modern slavery throughout our supply chains.

John Menzies Ltd and its Subsidiaries take a zero-tolerance approach to all forms of modern slavery including child labour and forced labour and are committed to protecting and supporting human rights. We respect the right to freedom of association and fair work and wages for our employees.

As a signatory of the United Nations Global Compact and member of the UK Global Compact Network since April 2021, we fully support the United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. 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.

We published our first Communication on Progress for UN SDGs and UN Global Compact in September 2022, and the latest update can be found on the UN Global Compact [website](#).

In addition to this, our [2024 Annual Review and Sustainability Report](#) provides information on our progress against the UN SDG including 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 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. Commitments include:

- Zero tolerance to unethical behaviour
- Ensuring sustainable and ethical supply chains and partnerships everywhere we operate
- 1% of our global population recruited from refugees by end 2026





Menzies Aviation has been a member of the Tent Partnership for Refugees (Tent) since December 2022 and have expanded our support of Tent in the UK, Europe, US and most recently as a founding member of Tent Mexico. Tent connects businesses with government agencies and organisations who work with people that have refugee status.

In 2024, building on our existing commitment, we engaged with the UNHCR, the UN Refugee Agency, to explore ways in which Menzies can enhance refugee outreach, facilitate workforce integration, and improve labour mobility.



We have a global target to recruit refugees equivalent to 1% of our global employee population by end 2026.

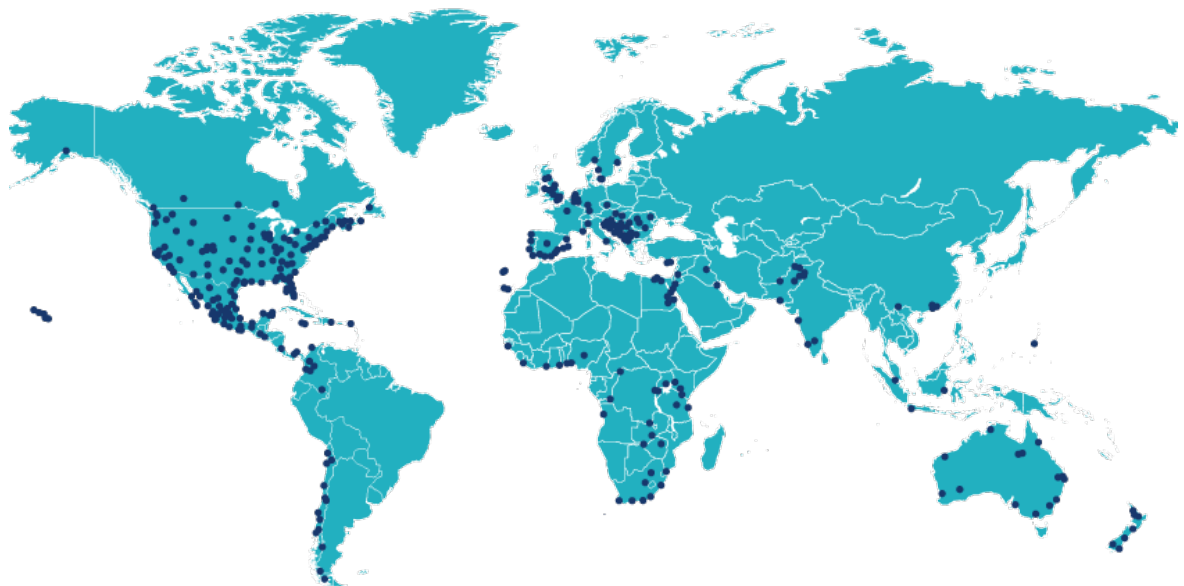
As a global employer, we can provide humanitarian support, offer employment opportunities and assist refugees and displaced people to integrate into their host communities, support local economies and social engagement.

With the support of Tent country networks and the UNHCR, we are focused on local recruitment programmes and partnerships to support the economic inclusion of refugees.

4. Our Global Business Structure & Operations

Established in 1833 in Scotland, Menzies Aviation is headquartered in London, United Kingdom, and is the largest global aviation services company managing the highest number of aircraft turns annually. We are a partner to the world's airports and airlines, with operations at over 300 airports in 65 countries.

We take pride in providing the safest, most secure and consistent aviation services tailored to our customers' needs. This will continue to be our priority as we grow alongside our customers and support their sustainability journeys as the industry transitions to a net-zero future.



Core Services & Customers

Ground Services

We provide time-critical comprehensive ground services, ensuring efficient and on schedule operations for airlines and passengers alike. From aircraft and baggage handling to ramp services and passenger assistance, every passenger journey has multiple seen and unseen interactions with our teams. We always do our best to deliver a safe and trusted service, working seamlessly behind the scenes to deliver a worldclass passenger experience.

Our services include:

- Ramp handling and baggage
- De-icing aircraft
- Cabin presentation
- Passenger services from check-in to boarding
- Engineering
- Fixed Base Operations

Fuel Services

We are the world's largest independent aviation fuel service provider. We deliver fuel farm management and into-plane fuelling services on four continents for the world's largest fuel suppliers, airports and airlines. Managing the refuelling of aircraft and the infrastructure required to support this service is a precision activity which must operate to rigorous government and industry standards, including safety and environmental regulations.

We provide:

- Into-plane fuelling
- Fuel storage and hydrant management
- Technical services

Air Cargo Services

We manage the global transportation of high value and time critical cargo, offering efficient, reliable and secure solutions for the transportation of goods across airports worldwide. Decades of experience, supported by cost-effective and innovative logistics solutions, means we are trusted to provide a reliable and secure service, ensuring our customers' cargo reaches its destination on time and in perfect condition.

We provide:

- Warehouse storage facilities
- Build-up and breakdown
- Customs clearance requirements
- Aircraft loading and unloading
- Freight aircraft handling
- Special cargo handling such as live animals and pharma
- Labour-only services
- Freight forwarding

Executive Services

Pearl Elevated Travel offers luxury travel support globally. Our Pearl lounges welcome guests of the world's leading airlines and membership programme partners, providing premium amenities, concierge assistance, and priority access to check-in, security, and passport control. We also deliver top tier ground handling services through Pearl Executive Aviation for private jets, VIP passengers, and crews, ensuring the highest standards of safety, security, and customer service.

Our services include:

- Pearl Lounges
- Meet & Assist
- Fixed Based Operator
- Executive Aviation

Our Global Business Key Facts 2024

300+

airports

65

countries

50k+

employees

1.5m

aircraft turns
handled

3.3m

aircraft fuelled

2.4m

tonnes of cargo
handled

350k

freight forwarding
shipments

2.8m

lounge guests

250m

passengers served

4.8m

flights served

Our Structure and Global Workforce

The Company is managed on a geographical basis primarily in four regional segments: the Americas, Middle East, Africa and Asia, Europe and UK, and Oceania & Southeast Asia.

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 UK headquarters and regional offices.

Our employee population has increased significantly over the last few years to well over 50,000 employees today, and continues to grow as our business expands.

51,662

Total headcount
31.12 2024

71%

male

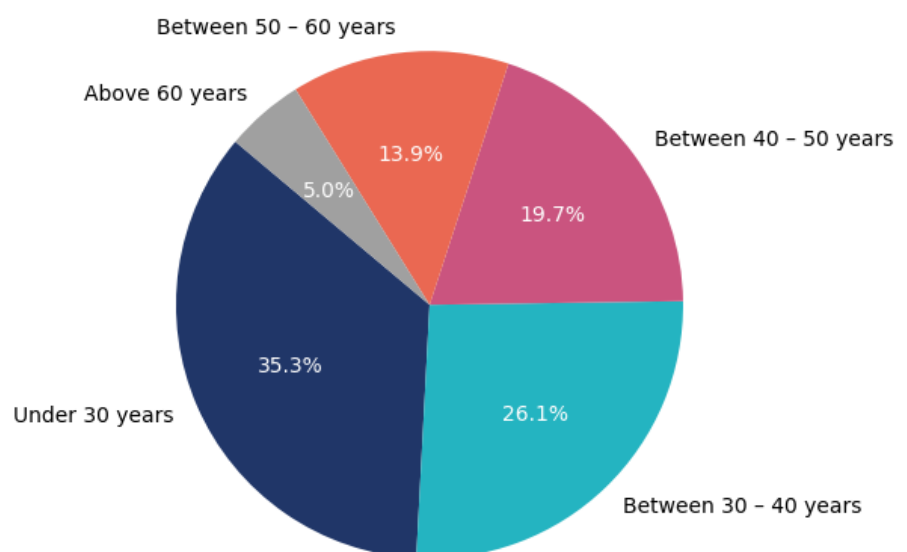
29%

female

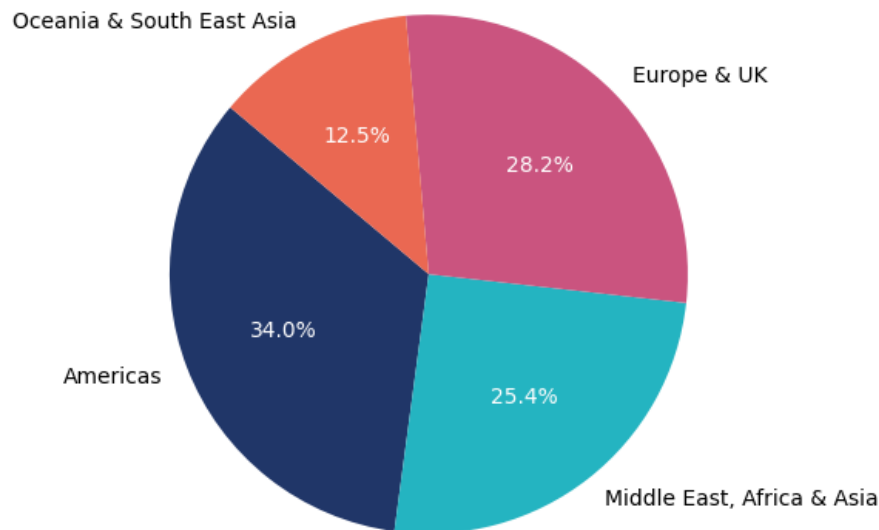
7,477

Additional
contract/temporary
workers

Employee Distribution by Age Range



Employee Distribution by Region



Our employees are supported by agency workers in many locations, as well as migrant workers in some locations where we operate. With an increasing number of employees to onboard, support and develop, it is vital we maintain excellent recruiting and onboarding practices and training, as well as ensuring our local teams are equipped with the tools, skills and knowledge to nurture and lead.

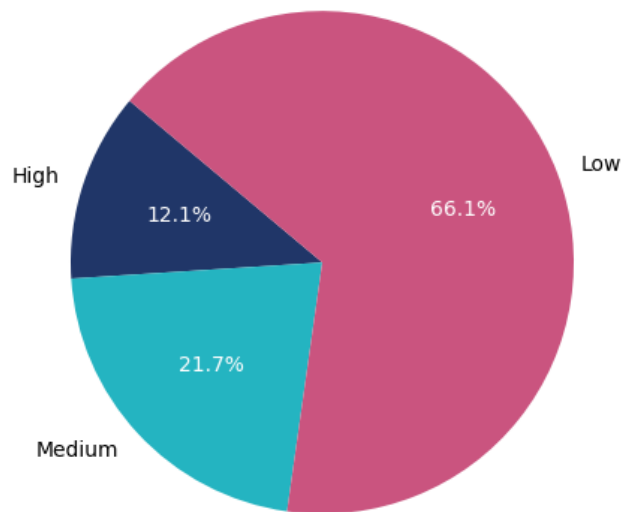
Further details of our global business operations can be found in our **Annual Review and Sustainability Report 2024**: <https://menziesaviation.com/wp-content/uploads/2025/03/MA-Annual-Review-Sustainability-Report-2024.pdf>

Global Supply Chain

Our global supply chains rely on 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 engage with many local suppliers as well as global suppliers. In 2024 we worked with over 14,000 suppliers globally. We categorise all suppliers based on the type of products or services they supply, and use supplier category, geographical data and financial value/spend to evaluate supplier risk at a high-level. We completed a full-risk assessment of our entire supplier population, identifying those who were high, medium and low risk, and across risk categories such as human rights & fair labour, with the following chart showing the outcome.

Labour & Human Rights Risk Distribution



Our top suppliers globally are focused on ground service equipment and maintenance, IT solutions and infrastructure, fuel, labour providers and professional services.

In 2024, 75% of our supplier population were located in the following countries:

- United States
- United Kingdom
- Canada
- Australia
- South Africa
- Pakistan
- Netherlands
- Hungary
- Czech Republic
- New Zealand
- Mexico
- Sweden
- Portugal
- Spain

While 75% of supplier spend was with suppliers located in the following countries:

- United States
- United Kingdom
- Australia
- Netherlands
- Mexico
- Canada
- South Africa
- Kuwait
- Spain
- Portugal

5. Our Australian Operations

The chart on the right shows our Australian entities in scope for this report.

Our Australian entities undertake aviation ground handling services, cargo, freight forwarding and engineering services at eleven airport locations across Australia where we are supported by over 2,500 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, engineering, safety and security.

Office roles within our business generally include human resources, IT, finance, safety, commercial, office administration, and managerial roles.

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 Air Support Pty Ltd are all registered labour hire providers in Victoria, Australia, in accordance with local legislation.

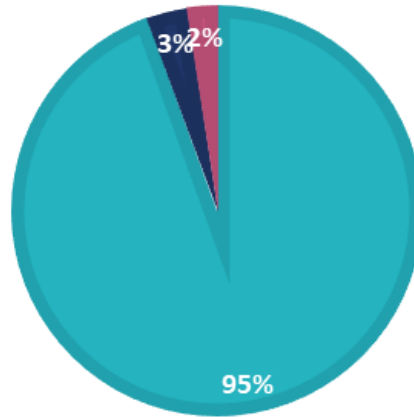
Our Workforce in Australia

Our workforce in Australia totals 2,888 workers with a split of 94% permanent employees and 6% agency resource. We are pleased to have both increased our workforce and our proportion of permanent employees compared with the previous year, when the split was 87% permanent employees, and 13% from agency resource.

Location (Airport)	Total Employees	Casual/Agency
Adelaide (ADL)	89	5
Brisbane (BNE)	444	5
Cairns (CNS)	119	1
Darwin (DRW)	119	0
Kalgoorlie (KGI)	17	0
Karratha (KTA)	34	0
Melbourne (MEL)	672	32
Coolongatta (OOL)	8	0
Perth (PER)	506	12
Sydney (SYD)	656	110
Toowoomba (WTB)	4	0
Regional Management Teams	54	1
Totals	2,722	166

WORKFORCE BY ROLE TYPE

■ Operations (ungraded) ■ Support (ungraded) ■ Graded Managers



Job Group	Total Heads
Business Support	16
Cargo Management	2
Commercial and Business Development	2
Engineering Management	1
Finance	24
GSE Management	2
HR	18
Information Technology	8
Operational Leadership	22
Operational Training	26
Operations Management	2
Passenger Services Management	12
Planning	14
Ramp Services Management	8
Risk	16
Total	173

Our Australian Supply Chain

Within Australia, our top suppliers include, but are not limited to:

Product/Service Supplied	Supplier
- Aircraft cabin cleaning services	- Cabin Services Australia
- Agency labour	- Blue Collar Recruitment - Wymap People - Momentum Consulting Group - Certis Security - Chief
- Cargo trucking solutions	- Wymap Group
- Ground service equipment and maintenance	- TCR
- Fuel provider for equipment and vehicles	- Mini-Tankers Australia
- Forklift trucks	- Linde - Toyota
- Uniforms	- Selection Clothing

We also rely on many third parties for IT services, office supplies and office cleaning. Agency labour is necessary to support seasonal work and where we face workforce shortages and challenges recruiting directly in the local labour market. We only use trusted partners for this type of labour support, many of whom will become direct employees.

The risk of human rights breaches is reduced for cabin cleaning service providers and similar, where staff must be security cleared to be able to operate airside. This includes checks by Australian Border Force.

6. Our Norwegian Operations

Our operations in Norway consist of two separate entities, both located at Oslo Airport:

- Menzies Aviation (Ground Handling Services)
- Menzies Aviation Washing (Aircraft Washing Services)

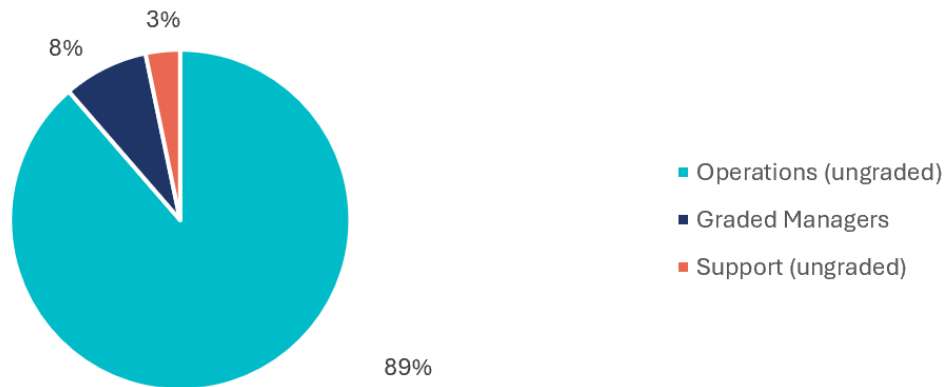
Our Workforce in Norway

Our workforce in Norway consists of 539 employees. The OSL station has no current workers contracted through agencies, nor any employees on casual worker contracts. Seasonal contracted workers cover a temporary need during winter or summer operations throughout the year. All employees are in addition of Norwegian Work Environmental Act governed by a CLA, ensuring equal, fair and safe conditions for the workers.

Entity	Total Employees	Seasonal Employees
Menzies Aviation Oslo AS (GHS)	517	18
Menzies Aviation Washing AS	4	0



Workforce by role type, Norway



Operational roles include Passenger Services, Operational Control Centre and Turnround Coordinators, Baggage Handling, Ramp Handling, De-icing operations.

Support roles consist of administrative support such as payroll, finance, planning and HR, GSE, Safety, GSE and other office positions.

Our Norwegian Supply Chain

Our top suppliers in Norway include, but are not limited to:

Product/Service Supplied	Supplier
- Aircraft cabin cleaning services	- Sodexo
- Recruiting agency for candidate search and initial screening	- Pegasus
- Ground service equipment and maintenance	- TCR GSE - HiSERV
- Cleaning services for company facilities	- Vaske Jentene
- Catering services provider	- SSP
- Uniforms, office supplies etc.	

Known and trusted providers are used for the services provided by external parties. Risk of any breaches of human rights are also reduced for those companies operating on the airside, as the Norwegian CAA conduct background checks for ID-card holders at the airport, security checks are a daily routine, and border control checks are conducted as necessary.

7. Company Policy in Relation to Modern Slavery & Human Trafficking

Governance

We believe that good governance in today's world is built on strong internal practices that embed social and environmental considerations, as well as ethical conduct, integrity and transparency. Our approach to protecting human rights, fair labour and preventing modern slavery forms a core part of our All In sustainability plan and our company policies and procedures, with the full support of our John Menzies Ltd Board of Directors. Our programme and policies extend company-wide including all our Menzies entities and subsidiaries, as well as sister companies and majority joint ventures. The ultimate responsibility is owned by our John Menzies Ltd Chief Governance & Sustainability Officer.

Our policies and controls are assessed regularly to ensure they remain fit for purpose and evolve and improve in line with changing legislation, business priorities and risk areas, as well as the changing expectations of our stakeholders.

Our All In plan sets goals and commitments across environmental, social and governance topics that are material for our Company. 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.

More details on how we govern ourselves can be found on page 48 of our Annual Review and Sustainability Report 2024: <https://menziesaviation.com/wp-content/uploads/2025/03/MA-Annual-Review-Sustainability-Report-2024.pdf>

Policies and Procedures

Code of Conduct:

Our Code of Conduct (Code) 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 and freedom of association, fair work and wages for our employees, and protecting their rights. It also covers key areas of ethics, compliance, and sustainability, including modern slavery and human trafficking, human rights, equality, diversity and inclusion, anti-bribery and corruption, environment, the UN SDGs, wellbeing and protecting assets, amongst many other topics.

Human Rights & Fair Labour:

Our Human Rights and Fair Labour Policy sets clear guidance and standards for protecting human rights, fair labour and modern slavery. We adhere to local labour legislation in the areas where we operate and we never employ people younger than 16 anywhere in our operations and those between 16-18 are restricted in the activities they perform, including nighttime working and working in hazardous conditions.

Employee Accommodation Policy:

Our Employee Accommodation Policy sets out the minimum standards for living accommodation, health, safety and security and wellbeing, for the development, maintenance

and operation/facilitations of any employee accommodation we provide or that is provided on our behalf.

A workplace free from harassment:

The Company and its Subsidiaries has zero tolerance for any violence or harassment of any kind in the workplace. We all have a right to work free from intimidation and harassment and in an environment where we feel safe and comfortable. We expect all employees to treat each other with courtesy, dignity and respect. In 2024, we introduced new Sexual Harassment Policy and targeted training for employees, which supplements our existing Dignity and Respect learning module, and aims to educate and reduce the risk of any occurrences in the workplace.

Our ethics, compliance and sustainability-related policies are typically available in 18 languages, reflecting our growing business and increasingly diverse employee population. We want to ensure that policies are readily available, clear and understandable by all employees.

Other Compliance, People and Sustainability Policies:

We have many more dedicated people and compliance-related policies and training modules implemented company-wide including: Anti-Bribery and Anti-Corruption; Equality, Diversity and Inclusion; SpeakUp Guidance; to name a small few.

8. Third Party Policies and Due Diligence

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 from our own third parties, including suppliers, contractors, consultants (our “Suppliers”) and joint venture partners.

We continue to invest in improving our approach to due diligence through our systems, procedures and education. We seek to ensure that we engage only with those Suppliers who uphold the values to which we adhere and require that all our Suppliers, through contractual commitments, act ethically and with integrity at all times, sharing our commitment to humane and safe working practices.

In 2024, we were one of the first UK headquartered companies to participate in the UN Sustainable Suppliers Training Programme. We aim to drive improvements across the wider ESG spectrum within our supplier population through the programme, including the approach to labour and human rights for small to medium sized businesses.

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, and The Labour Rights Index.

We monitor the risk of human rights breaches, fair labour and modern slavery within our overall approach to identifying risks across our business and supply chain. 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.

Our commitment to sustainability, ethical business conduct, and our zero-tolerance position in relation to slavery and human trafficking is evidenced in several ways through our controls and procedures.

1. Through the incorporation of contractual safeguards within our Supplier contracts covering areas such as modern slavery, anti—bribery and anti-corruption, as well as adherence to our Third Party Code of Conduct. 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. We are introducing improved tracking of acceptance of our Third Party Code of Conduct in 2025.

Our Third Party Code of Conduct is available to view at:
<https://menziesaviation.com/third-party-code-of-conduct/>

2. We adopt a risk-based approach to due diligence including for example, human rights and fair labour, ethical conduct, environment, safety, and information security, prior to entering a relationship with any Supplier who may be considered high risk and/or who operates in a higher risk region(s).

Our Third Party Risk Management (TPRM) system is being further enhanced in 2025 to capture increased information on suppliers and sub-contractors in particular. We continue to engage the support of Deloitte with this initiative. The system has links to external databases with the specific aim of enabling supplier risk assessment, due diligence, onboarding and ongoing continued monitoring. Supporting procedures, risk assessments and controls, including a specific focus on human rights, fair labour and modern slavery risks.

We completed a human rights and fair labour/modern slavery risk assessment of our global supplier population providing us with a greater insight to target and work more closely with high-risk suppliers on mitigating human rights, fair labour and modern slavery risks within their operations and supply chains.

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 partners and employees.

9. Risks of Modern Slavery Practices within Operations and Supply Chains

There will always be a risk of modern slavery practices occurring within our business, supply chains and operations, which may evolve as we enter new countries of operation or as employee practices change, or as we take on new suppliers and partners. There is also an

increased risk due to more displaced peoples through conflict. It's important we remain alert to potential new risks and external social factors and continue to monitor our operations and our supply chain where such risks are most likely to occur.

Employee Accommodation

Menzies Aviation provides employee accommodation facilities in Mexico (Cancun, San José del Cabo and Puerto Vallarta) and Kuwait. We currently house around 1,168 individuals (14% female/86% male) across 9 facilities, with capacity for 1,479 habitants. Our Employee Accommodation Policy sets the minimum standards, controls and facilities that are expected to be in place for all employee accommodations to ensure health, safety, security, hygiene, protection of human rights, wellbeing and a comfortable space and environment for residents, and environmental sustainability. This is further supported by our Human Rights & Fair Labour Policy and Speak Up Policy & Guidance. We completed physical internal audits of accommodations in 2024 identifying areas of improvement, and commit to repeating our audits at least annually, with spot checks and visits in between.

Modern Slavery Risks

We regularly review risks as part of our overall enterprise risk framework. Following our latest review of the risks of modern slavery practices that could arise in relation to our operations, we have noted key updates below.

1. We continue the recruitment of refugees in some geographies, aligned with our target to support refugee recruitment more widely and onboard refugees equivalent to 1% of global population by end 2026. As part of this, it is important to work with authorities and agencies who we know adhere to the highest standards of protecting human rights.
2. As we employ some seasonal workers, we are mindful that individuals on temporary visas and international students can be subjected to poor working and living conditions in some countries.
3. As our population continues to grow and we engage with new labour agencies in new geographies, there remains a heightened risk, particularly where those resources are engaged on a temporary basis as opposed to becoming our own permanent employees.
4. We are aware there are local nuances and risks we need to be aware of, particularly when considering import of products and materials. We are focusing on assessing our uniform providers as we engage with new providers and roll out our refreshed uniforms globally.
5. As our business grows, we both inherit and directly seek new suppliers in new geographies. There is a risk we inadvertently work with a new supplier who may not adhere to the same standards we do. Integrating and implementing our supplier procedures including due diligence and contractual controls will help minimize any risks and impacts.



Modern Slavery Risk	Potential Issues	Actions Taken to Assess and Address Risks
Directly employed staff	<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>Onboarding migrant and refugee workers poses specific risks where workers may be more vulnerable and less familiar with acceptable recruiting practices.</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 company 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> <p>Provide additional support and training for guiding refugee workers through the recruitment and onboarding process, as well as extra support to help them become part of the local community.</p> <p>Provide recruiters, managers and co-workers with training and guidance for supporting refugee workers successfully into the workplace.</p>
Employee Accommodation	<p>Sub-standard accommodation, unsafe accommodation or the restrictions placed on employees who live in the accommodation may impact human rights or workers health and wellbeing.</p> <p>Incorrectly managing employment terms and conditions and the provision of accommodation as part of an employee's contract or role could contravene fair labour and employment standards and laws.</p>	<p>Our Employee Accommodation policy and our internal checks and audit processes, as well as regular visits from senior leadership gives us confidence that we are meeting the required standards and protecting our employees' human rights, as well as safety and wellbeing.</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 of our suppliers.</p> <p>Potential for undertaking our own or requesting independent audits.</p>
Suppliers & Sub-contractors	<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 are implementing enhanced sub-contractor onboarding due diligence within our Third Party Supplier Onboarding solution.</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 in the sections of our report below, including enhanced due diligence and evidence of independent audits. We may also undertake our own audits, where appropriate.</p>
Importing Products	<p>Sourcing or importing products where there may be a risk of modern slavery or poor human rights practices beyond tier 1 level.</p>	<p>Focus on those products where there is the greatest risk e.g. uniform or PPE providers, or other forms of manufactured goods.</p>
Human Trafficking	<p>Where our frontline passengers services staff are operating in airport passenger services check-in and boarding, there is a risk of encountering passengers who may be trafficking vulnerable adults or children.</p>	<p>Our staff are trained to be aware of and identify the signs of potential human trafficking, as well as being vigilant and detecting falsified travel documents. They know what to do should they ever believe an incident is occurring.</p>

10. Governance and Actions for Mitigating Modern Slavery Risks

Risks at each of our operating locations are assessed based on geography, migrant worker and refugee populations, sub-contractors engaged, and where we provide employee accommodation. We also identify risks and undertake audits of our own employee accommodation.

Our business and internal risks relating to modern slavery, fair labour and human rights are captured and monitored as part of our overarching enterprise risk management framework and entered, reported on and tracked in our online risk registers. This may include direct or indirect risks. Our Risk Committee reviews enterprise risks on a regular basis throughout the year and reports to the Executive Management Board as well as the Audit Committee.

Risks identified in our supplier population through risks assessments and/or due diligence are managed directly with each supplier as they arise.

As we enter new geographies, we must reassess risks and ensure our procedures and policies are adequate for controlling or mitigating any potential new direct or indirect risks of modern slavery, or implement additional or new ways to mitigate those risks.

11. 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, including suppliers, 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 is available in a number of languages and the service itself is available in the local language of every location where we operate. Contact details are displayed in operational locations e.g. breakrooms. Our guidance provides information 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.

As our business has grown over the last few years, we have continued to experience an increase in the volume of reports made via SpeakUp – in total we received 941 reports across all topics in 2024. We ensure employees are made aware of the service with contact details

visible in all work locations e.g. breakrooms. The increased awareness and reports give us confidence that our communications are effective, more people feel comfortable making a report and as a result, and we gain greater insight into employee concerns and relations. Most reports continue to 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 are fully committed to conducting the appropriate investigations and taking the necessary actions should evidence of human rights or fair labour breaches, including modern slavery, ever be identified via SpeakUp or through any other channels. Should any issues be identified or confirmed, 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 protecting human rights, fair labour and modern slavery, as well as other compliance topics, where we believe this may be appropriate and/or beneficial. Where any issues cannot be resolved together with Suppliers or our Business Partners, or in any other part of our supply chain, steps will be taken to sever the relationship or report this to the relevant authorities, where appropriate,

12. Training

We provide continuous learning on ethics, compliance and sustainability topics, and regularly review and improve our policies, practices, and training programmes to address emerging risks and challenges. Training is completed on a cycle of every 1, 2, or 3 years, depending on the topic. To further embed ethical understanding and behaviours, we provide guidance and prompts via other communications on all ethics and compliance topics.

Our Code of Conduct training and many of our other ethical and compliance courses are taken by every employee globally, and other more specific training is role-based.

Our Code of Conduct e-learning module is designed to provide all our employees with a good awareness and understanding of ethical conduct, compliance sustainability topics that apply to our global business, as well as core policies, procedures, legal obligations, and the behaviours we expect. This module includes reinforces our commitment to human rights and our zero-tolerance to all forms of modern slavery and human trafficking.

We have been providing specific Anti-Slavery and Human Trafficking Awareness e-learning to all our employees since 2019, with around 6,500 employees completing this course in 2024. It 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.

We also provide guidance for those employees who onboard new workers, including specific new guidance on recruiting and onboarding refugees as employees.

In 2024, the Company signed up to participate in the UN Global Compact Sustainable Suppliers Training Programme. The training is aimed at the suppliers of large companies such as Menzies, to provide knowledge and resources on corporate sustainability based on the Ten Principles of the UN Global Compact and the Sustainable Development Goals. This includes a focus on human rights. Registration for suppliers closed in March 2025 and training is underway. We will continue to offer this training to our suppliers free of charge beyond 2024/2025.

13. Measuring Performance & Effectiveness

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.

1. 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. We also request employees to read and sign our core policies and our Code of Conduct.
2. Our 8 Pillar Audit Programme and associated documentation takes into account the provisions for assessing awareness and accessibility of our Code of Conduct, Human Rights and Fair Labour Policy 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 all 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 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.
3. Our supplier risk assessments help identify those suppliers who need additional focus and due diligence. Our Third Party Risk Management solution gives greater oversight of our supplier population, and will reduce our risk and exposure to wrongdoing within our supply chain, and offer improved auditing and monitoring of suppliers and sub-contractors going forward.
4. Our HR teams recruitment procedures and engagement with labour providers supports our due diligence and controls for onboarding employees and agency resources, particularly in those areas where we may consider there to be a higher risk.
5. We have controls and checks to monitor compliance with employee accommodation standards. This includes physical audits and regular checks of employee accommodation annually and on an ad-hoc basis, including unannounced checks.

6. Our SpeakUp confidential reporting solution offers another way for us to monitor for any reports of wrongdoing raised by employees, agency workers and contractors or other third parties.

CASE STUDY: Anti-Human Trafficking Training in Action

An amazing example of putting training into practice during 2024 was in Puerto Vallarta, Mexico, where a member of our passenger services team identified and prevented a human trafficking incident, not once, but on two separate occasions. Thanks to their diligence and ability to identify the risks and potential signs of trafficking, they were able to safely raise the alarm during the check-in process allowing authorities to intervene and prevent both cases of human trafficking from taking place. This further led to local authorities identifying and breaking up a wider network of human trafficking.

One other instance of human trafficking was detected and prevented in South Africa during 2024, and one other instance has been prevented so far in 2025.

3

Instances of human trafficking identified and prevented during the course of our operations (see Case Study above)

Zero

International Labour Organization (ILO) indicators of forced labour or modern slavery identified anywhere in our own operations or supply chain

6,500

training modules completed on Modern Slavery & Human Trafficking by employees

14. Continuous Improvement Plans - Key Areas of Action 2025

Our aim is to ensure that our ethical and legal obligations and responsibilities in relation to human rights, fair labour, modern slavery and human trafficking, together with other key compliance and sustainability 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 Company's supply chains under review to identify and monitor ongoing and future risks.

The actions below reflect continued and new key areas of action to be delivered over the next two years that will help us strengthen our measures to detect and prevent breaches of human rights, fair labour, slavery and human trafficking taking place in our supply chains or any part of our business:

Action	2024 Steps	2025 Steps
Continue to improve our Supplier due diligence and Third Party Risk Management procedures.	<p>Communication with all suppliers.</p> <p>Review our audit process for high-risk suppliers.</p> <p>Ensure all suppliers are made aware and receive our updated Third Party Code of Conduct.</p> <p>A large population of suppliers invited to participate in the UN Sustainable Suppliers Training Programme.</p>	<p>Ensure all required suppliers successfully complete required levels of due diligence.</p> <p>Review effectiveness of our risk-criteria and engagement levels with suppliers.</p> <p>Identify and implement pro-active remediation guidance for third parties.</p> <p>Improved tracking of acceptance of our Third Party Code of Conduct.</p> <p>Monitor success of UN Sustainable Suppliers Training Programme and invite more suppliers to participate in the second year of the programme.</p> <p>Enhanced sub-contractor due diligence.</p> <p>Enhanced due diligence and audit of our uniform providers.</p>
Continue to develop our refugee onboarding programme and improved processes and monitoring for the recruitment of migrant workers.	<p>Continue our work with Tent, the UN HCR and partner organisations to share experiences and build on best practice procedures and guidance for the safe recruitment and onboarding of refugees.</p> <p>Review feedback and experiences of refugees onboarded to identify improvements that can be made.</p>	<p>Monitor onboarding and review experiences with onboarded refugees where we see the largest populations e.g. Mexico.</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>Continue to understand new ways we can improve our support of human rights more fully within the Company and our supply chains, through our commitments and learnings as a signatory of the UN Global Compact.</p>	<p>We are considering how we can benefit from further learning and partnerships with country specific organisations who specialise in supporting businesses with modern slavery best-practice.</p>
Continue to develop and create awareness of modern slavery and other human rights risks across our Company.	<p>Identify new, practical guidance to engage and refresh awareness and learning for employees.</p> <p>Further upskilling for employees engaged with labour agencies and direct recruitment.</p> <p>Establish employee accommodation forums.</p>	<p>Review learning and policies and refresh, if required.</p> <p>Identify and implement improvements to our internal audit procedures for employee accommodation.</p> <p>Awareness of real-life human trafficking incidents that employees have prevented.</p>

Monitor for new human rights and fair labour regulation, legislation and reporting requirements across different geographies and incorporate this into our processes, policies and reporting.	Adapt our procedures, policies and controls, particularly for human rights and fair labour due diligence, aligned with new legislation in geographies where we operate, particularly in relation to the European Union.	Continue to adapt and ensure compliance with all new human rights and fair labour regulation and legislation and reporting and disclosure requirements.
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15. Further Information

Our customers and other key stakeholders can request further information in relation to this Statement including how the Company addresses human rights risks and its due diligence processes via: Menzies.Sustainability@menziesaviation.com.

This Statement has been approved by the Board of Directors of John Menzies Ltd and signed on behalf of the Company and all Subsidiaries by John Geddes, Chief Governance & Sustainability Officer and 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 2025
John Geddes
Chief Governance & Sustainability Officer



30th June 2025
Darren Masters
EVP Oceania & Southeast Asia
MA (Holdings) Australia Pty Ltd
Menzies Aviation (Ground Services)
Australia Pty Ltd



30th June 2025
Mike Roberts
SVP Finance
MA (Holdings) Australia Pty Ltd
Menzies Aviation (Ground Services) Australia
Pty Ltd