



Modern Slavery & Human Rights Due Diligence Statement 2025

30 June 2026

People. Passion. Pride. Since 1833.



This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and the Norwegian Transparency Act 2022 (together, “the Acts”) and covers the financial year ending 31 December 2025.

It is issued by John Menzies Ltd and certain of its wholly owned subsidiaries that are required to report under one or more of the Acts. These entities include the following:

- Menzies Aviation (UK) Limited,
- Menzies Aviation (ASIG) Limited
- Air Menzies International Limited
- Menzies Aviation (Holdings) Australia Pty Limited
- Menzies Aviation (Ground Services) Australia Pty Ltd
- Menzies Aviation (Oslo) AS
- Menzies World Cargo (Oslo) AS

References to “we”, “us”, or “our” in this statement refer to John Menzies Ltd and the subsidiaries listed above.

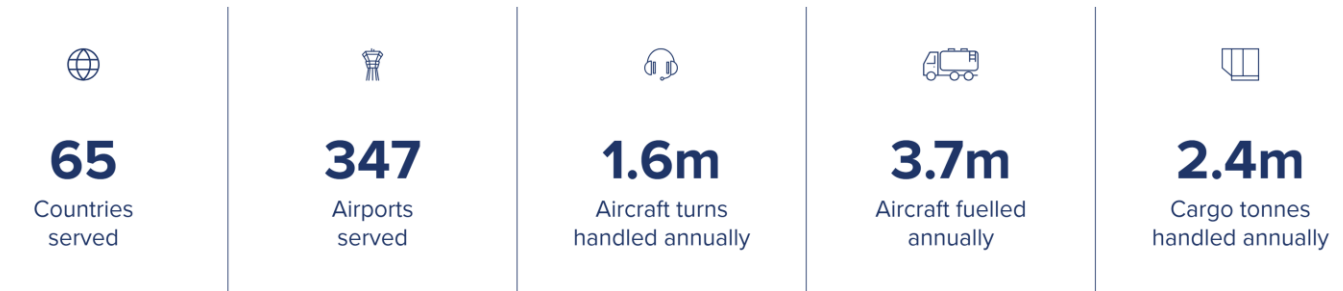
As required by the Acts, this statement describes the steps we have taken to prevent modern slavery in our operations and supply chain, and outlines our approach to human rights due diligence.

This statement will be published on the UK Government’s Modern Slavery Statement Registry, the Australian Government’s Modern Slavery Statements Register, and on the Menzies Aviation website: <https://menziesaviation.com>.

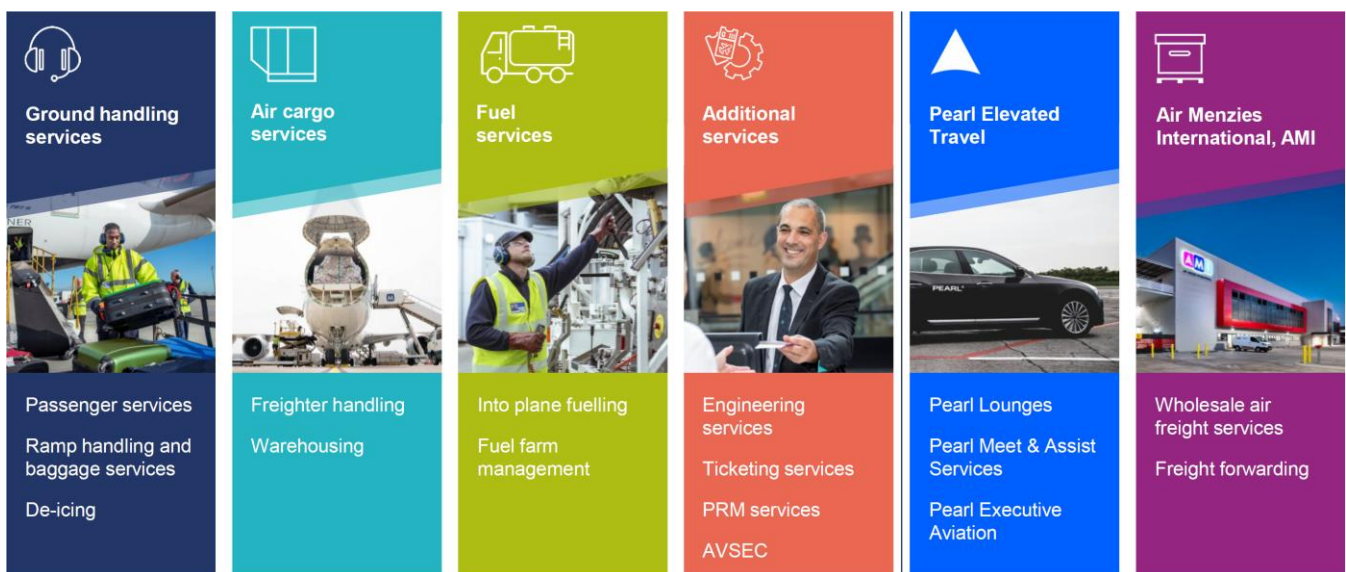


1. Our structure, operations, and supply chain

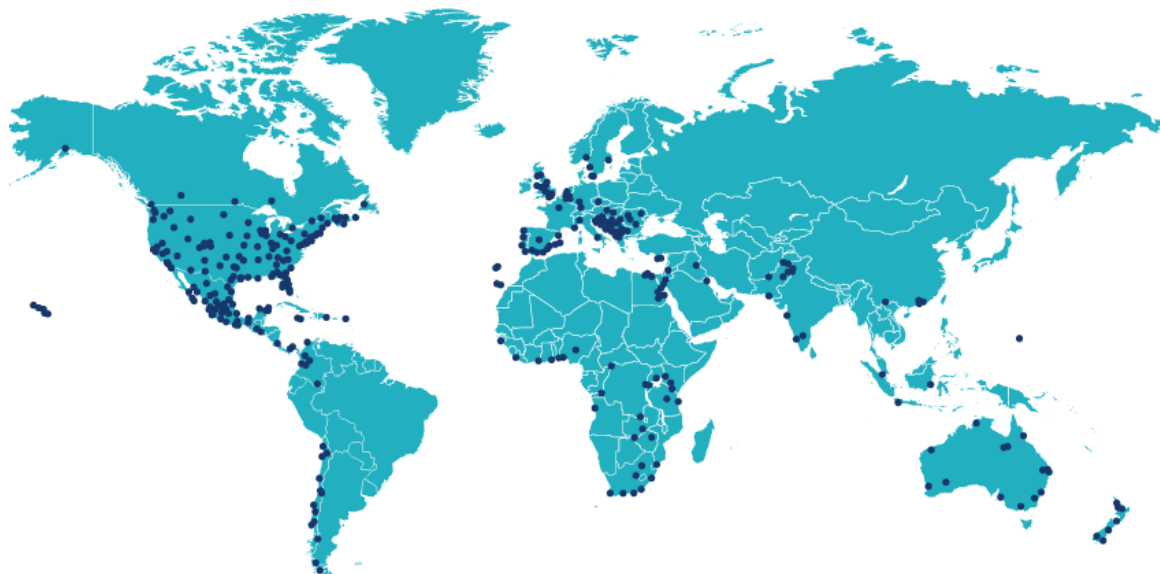
Menzies Aviation is a global aviation services provider headquartered in the United Kingdom, with operations spanning 347 airports in 65 countries and employing 65,000 people.



We provide ground handling, fuelling, air cargo, freight forwarding and executive services, to airlines and airport partners worldwide.



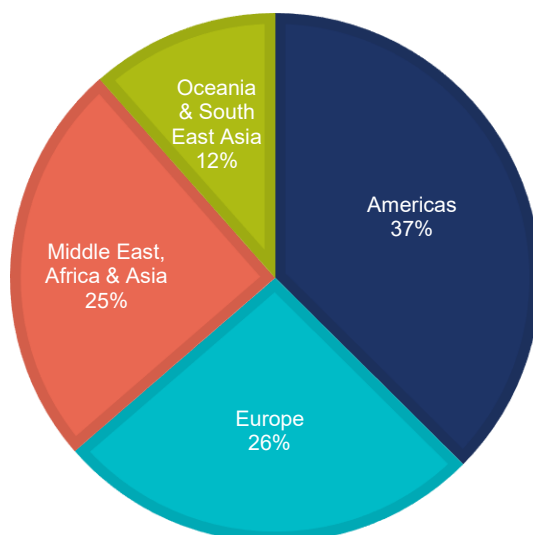
Our operations are organised into four regions: the Americas; Europe; Middle East, Africa and Asia; and Oceania and Southeast Asia. Each region has a dedicated leadership team responsible for operational delivery, local oversight, and implementation of risk management and due diligence processes. Regions are supported by global functions including legal, compliance, HR, ESG and risk.



The reporting entities operate across a number of jurisdictions. In the United Kingdom, operations provide ground handling, cargo, fuel and freight forwarding services across 13 airport locations. In Australia, operations provide ground handling, cargo, engineering and freight forwarding services across 15 airport locations. In Norway, operations are based at Oslo Airport and provide ground handling, cargo, and aircraft washing services.

Our workforce

In 2025, our workforce expanded to 65,000 people distributed across our global operations. Employee distribution by region:



Our operations are primarily supported by direct employees, supplemented by agency workers and subcontracted service providers where required. In certain geographies, our workforce includes migrant workers.

Recruitment of employees is through internal recruitment processes, external labour providers and recruitment agencies, and partnerships supporting refugee employment. These processes are supported by onboarding checks such as right-to-work verification, background screening and security clearance.

As a large global employer, we recognise that certain workforce groups, including temporary, agency and migrant workers, may be at increased risk of labour exploitation and unethical working practices. Managing these risks through responsible recruitment, onboarding and employment practices is a key priority, supported by robust governance, training and oversight across our operations.

Workforce composition, including the use of agency workers:

	Headcount	Agency workers	%
 Global business	64,968	7,721	12%
 United Kingdom	4,367	74	2%
 Australia	3,026	177	6%
 Norway	855	2	<1%

Our supply chain

Menzies Aviation's global operations are supported by a diverse global supply chain of approximately 12,000 suppliers, forming a critical network of goods and service providers.

Our suppliers are a combination of strategic global suppliers, regional and local providers. These relationships are supported by long-term contracts and framework agreements, alongside local procurement and one-off purchasing where required. Key supplier categories include:

Direct suppliers

		
Labour and recruitment agencies	Cleaning and security providers	Ground service equipment and maintenance providers
		
Fuel suppliers	Uniform and PPE manufacturers	IT systems and infrastructure providers

Indirect suppliers

		
Textile and manufacturing supply chains	Equipment manufacturing and maintenance spares	Indirect labour supply chains

Our suppliers operate across multiple regions, with 75% of our suppliers in the following markets:

Americas	United States, Canada, Mexico, Colombia, Jamaica.
Europe	United Kingdom, Portugal, Netherlands, Spain, Czech Republic, Hungary, Sweden.
MEAA	South Africa, Pakistan, India.
OSEA	Australia, New Zealand.

Governance and information gathering

Our governance, compliance and risk management frameworks are established centrally and implemented across all operations globally. Ultimate responsibility for identifying, assessing and addressing modern slavery risks rests with the Board of Directors of John Menzies Ltd, supported by the Risk and Audit Committees and the Chief Governance & Sustainability Officer. Policy development and operational responsibility are shared across global functions, including legal, compliance, HR, ESG and Risk, and regional leadership teams.

This Statement was prepared through consultation with relevant subsidiaries and internal stakeholders. Information is gathered from a range of sources, including third-party risk management processes, audit findings, incident reports, training data, enterprise risk registers and SpeakUp reports. It is also informed by engagement with external organisations, including the UN Global Compact, UNHCR, the Tent Partnership for Refugees and industry bodies such as IATA.



2. Policies related to modern slavery & human rights

We maintain a zero-tolerance approach to modern slavery, forced labour and child labour. Respect for human rights, fair working conditions and freedom of association are embedded within our policies and operations. Key policies include:

Code of Conduct	Our Code of Conduct sets out the core values and behaviours expected of all employees. It prohibits forced labour, child labour and human trafficking, and promotes ethical business conduct including fair wages, safe working conditions, and freedom of association. It is available in 20 languages and supported by mandatory training for all employees globally.
Third Party Code of Conduct	Our Third-Party Code of Conduct sets out the standards expected of suppliers and business partners. It requires ethical labour practices and safe working conditions, and prohibits forced labour, child labour and exploitation. Suppliers are required to accept the Code as part of onboarding and contracting processes. It is available on the Menzies Aviation website: https://menziesaviation.com/third-party-code-of-conduct/
Human Rights & Fair Labour Policy	Our Human Rights and Fair Labour Policy sets global minimum standards for protecting human rights, promoting fair labour and preventing modern slavery. It supports fair wages and safe working conditions, upholds freedom of association and collective bargaining, and prohibits harassment, violence, child labour and forced labour. We comply with local labour legislation in all jurisdictions and do not employ individuals under the age of 16. It is implemented through HR and recruitment processes and supported by ongoing monitoring through internal audits.
Employee Accommodation Policy	Our Employee Accommodation Policy sets minimum standards for accommodation provided to employees, ensuring safety, dignity and wellbeing and reducing risks related to exploitation, restricted movement and poor living conditions. It is implemented through regular inspections and annual accommodation audits overseen by senior leadership.
SpeakUp (Whistleblowing) Policy	Our SpeakUp (Whistleblowing) Policy provides confidential and anonymous channels for reporting concerns, including modern slavery risks, unethical conduct and breaches of policy. It ensures protection from retaliation for those reporting in good faith, and outlines investigation and remediation processes. It is communicated through multiple channels, and the SpeakUp system is accessible to all employees, contractors, suppliers and third parties through locally available reporting options.

Our policies are aligned with internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights, the ILO Core Conventions and the OECD Due Diligence Guidance for Responsible Business Conduct, and reflect our commitments as a signatory to the UN Global Compact.

Policies are reviewed regularly to ensure they remain fit for purpose and reflect changes in legislation, business priorities, risk profile and stakeholder expectations.

Policy development and review is supported by internal stakeholders across legal, compliance, HR and ESG, and informed by engagement with external organisations, including the UN Global Compact, UNHCR, the Tent Partnership for Refugees and relevant industry bodies such as IATA.



3. Risks and due diligence in relation to modern slavery & human rights

Our governance, compliance and enterprise risk management frameworks provide structured processes for modern slavery risks to be identified, assessed and managed across our global operations and supply chains, including in the reporting entities in the United Kingdom, Australia and Norway.

Risk identification is informed by supplier due diligence processes, internal audits, enterprise risk registers, SpeakUp reporting data and external risk indicators, including the Global Slavery Index, Transparency International indices and the TRACE Matrix. Risks are prioritised based on the severity of potential harm, likelihood of occurrence and our ability to influence outcomes.

Risks in our workforce

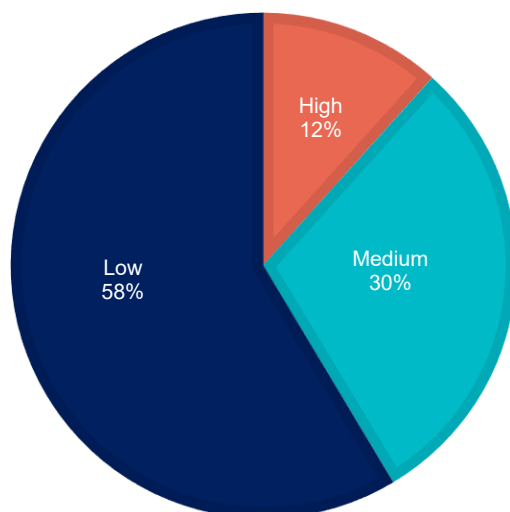
As a global employer operating in 65 countries, we recognise that modern slavery and human rights risks may arise within our workforce and labour supply chains, and that certain worker groups, including temporary workers, agency workers, migrant workers and refugees, may be more vulnerable.

In certain locations, we provide employee accommodation, which can have a potential risk of poor living conditions, restrictions on freedom of movement or other welfare concerns.

Risks in our supply chain

Given the scale and complexity of our global supply chain, we recognise that modern slavery risks may arise at different stages and may be elevated within certain supplier categories, geographies and particularly where labour providers, recruitment agencies, or subcontracting is involved.

During 2025, we conducted a global supplier risk assessment, categorising our 12,000 suppliers based on geography, supplier category and spend. The chart below shows the proportion of suppliers assessed as high, medium and low risk for labour and human rights issues.



While our supplier due diligence processes provide oversight of direct suppliers, visibility beyond tier 1 suppliers remains a challenge, particularly in relation to indirect suppliers and subcontractor relationships. During 2025, we continued to enhance our Third-Party Risk Management (TPRM) programme, supported by Deloitte, to strengthen supplier onboarding, risk assessment and ongoing monitoring.

We recognise that actions taken to address modern slavery risks may have unintended consequences, particularly for vulnerable workers. Accordingly, we prioritise supplier engagement, remediation, and capacity building before considering termination.

Risks in our operations

Our frontline passenger services employees regularly interact with passengers during check-in and boarding, where they may encounter indicators of human trafficking or exploitation of vulnerable persons. Through targeted role-specific training and reporting procedures, we equip our employees to recognise warning signs and escalate concerns appropriately.

Priority risks, due diligence and mitigation actions

The following table summarises our priority modern slavery risks and the key due diligence and mitigation actions being taken to address them.

Priority risks	Key actions
Directly employed staff	
Failure to follow appropriate recruitment, right-to-work or onboarding processes could increase the risk of labour exploitation.	Background screening and right-to-work checks Responsible recruitment and onboarding procedures Code of Conduct and mandatory compliance training SpeakUp confidential reporting channel
Employees joining from businesses we partner with or acquire may present a risk that historical employment or labour practices do not meet our standards.	Employment reviews during integration process All new employees are onboarded and inducted in accordance with our policies and standards Code of Conduct and mandatory compliance training SpeakUp confidential reporting channel
Temporary, agency, migrant and refugee workers may be more vulnerable and less familiar with acceptable recruiting and labour practices.	Additional onboarding and welfare support Provide recruiters, managers and co-workers with guidance for supporting refugee workers Partnership with UNHCR to support responsible refugee recruitment SpeakUp confidential reporting channel
Employee accommodation	
Where accommodation is provided, there is potential for risks relating to worker welfare, living conditions or restrictions on freedom of movement, particularly for migrant workers.	Employee Accommodation Policy Regular accommodation inspections Annual accommodation audits overseen by senior leadership Corrective action plans where issues identified
Labour providers and agency workers	
Risks associated with labour providers include unethical recruitment practices, worker exploitation, underpayment, excessive working hours and worker misclassification, particularly for temporary, agency or migrant workers.	Risk-based supplier due diligence before engagement Compliance with our Third Party Code of Conduct and applicable legislation required Supplier monitoring through our Third-Party Risk Management (TPRM) processes Guidance provided to HR, recruitment and operational teams on responsible recruitment practices Independent audits conducted where appropriate based on risk



Priority risks	Key actions
Higher risk suppliers & subcontractors	
Higher-risk suppliers and subcontractors may present increased risks relating to forced labour, poor working conditions and other human rights abuses.	Global supplier risk assessments based on geography, sector and spend Enhanced due diligence Ongoing monitoring through the TPRM system
Indirect suppliers	
Indirect suppliers and subcontractors may present increased risks of forced labour, underpayment, poor working conditions and human trafficking, particularly due to our limited visibility beyond tier 1 suppliers.	Enhanced due diligence for higher-risk supply chains Ongoing improvement of supplier visibility and mapping Information requests and engagement via Tier 1 suppliers Evidence of independent audits requested where appropriate
Human trafficking	
Frontline passenger services staff may encounter indicators of human trafficking during check-in and boarding.	Human trafficking awareness training for employees Role-specific training for frontline employees Guidance on recognising indicators of trafficking Reporting and escalation procedures Collaboration with airport authorities where appropriate

Grievance mechanisms and reporting

Our grievance processes allow our employees to raise and resolve workplace concerns fairly and promptly, while our independent SpeakUp service enables confidential and anonymous reporting.

SpeakUp is available globally in multiple languages and accessible to employees through a range of locally available reporting channels, as well as to suppliers and other third parties through a dedicated channel in our Third-Party Code of Conduct.

Reported concerns are investigated in accordance with established procedures and may result in corrective actions, supplier remediation, enhanced monitoring, termination of business relationships or escalation to relevant authorities.

Regular employee engagement, including surveys, helps inform our due diligence processes and identify areas for improvement.



4. Training

We provide training to employees and, increasingly, to our supply chain to support the identification, prevention and mitigation of modern slavery risks. Training forms part of our global learning and compliance programme and is delivered on a recurring basis, depending on role and subject matter.

Mandatory training includes Code of Conduct and Modern Slavery and Human Trafficking awareness modules. All employees are required to complete general awareness training:

Code of Conduct	Covering ethical behaviour, human rights, modern slavery, and how to report concerns through SpeakUp channels.
Modern Slavery	Focused on raising awareness of modern slavery, enabling employees to identify indicators of exploitation, recognise risks and report concerns.

Senior management teams are kept informed through reporting and briefings from compliance, HR and ESG teams, supported by participation in risk and compliance forums.



Frontline passenger facing staff receive additional training focused on airport specific operational risks, including practical guidance for identifying indicators of human trafficking and correct response and escalation processes. This has contributed to the successful identification and prevention of multiple suspected trafficking incidents.

HR and recruitment teams receive guidance on responsible recruitment and onboarding practices, including for migrant and refugee workers.

Supplier-facing roles receive guidance on supplier due diligence and risks and are supported by central third-party risk management processes for identifying high-risk suppliers.

Training effectiveness is monitored through completion rates and internal audit processes, and content is reviewed and updated periodically to reflect evolving risks and regulatory requirements. Training materials are developed by compliance, HR and ESG teams, with input from external organisations and industry initiatives where appropriate.

We also support supplier training through the UNGC Sustainable Suppliers Programme, providing training resources and guidance across our supply chain, particularly for small and medium-sized suppliers, to strengthen their understanding of human rights, labour standards and responsible business practices.

5. Monitoring, evaluation and continuous improvement

We monitor our modern slavery and human rights programme through a range of quantitative and qualitative data to assess effectiveness and identify opportunities for improvement.

Key performance indicators

Training



18k

employees completed Code of Conduct training



12k

employees completed Modern Slavery training



60

suppliers on UNGC Sustainable Suppliers Programme

Employee accommodation



3

'Casa Menzies' employee housing sites



340+

employees supported



32+

inspections completed

Reporting



1,895

SpeakUp reports received
Zero Modern Slavery related



Zero

incidents reported
(People Smuggling - Cat A)



3

incidents of human trafficking prevented

Supply chain



12k

suppliers risk assessed



88%

low/medium risk suppliers



Zero

confirmed reports of Modern Slavery in our supply chain

'Let's Check In' global employee survey



26k

responses globally



72%

feel confident to speak up when something doesn't seem right



80%

are aware of the process for reporting concerns



Employee feedback

In 2025, our Let's Check In employee survey provided valuable insight into workplace culture, awareness of reporting channels and confidence in speaking up. Survey findings indicated strong awareness of ethical standards and reporting mechanisms, including SpeakUp.

Survey results are reviewed at both global and regional levels to identify trends, potential areas of concern and opportunities for targeted action.

SpeakUp and incident reporting

SpeakUp and safety/security incident reporting data forms an important component of our monitoring processes. In 2025, we received 1,895 cases through the SpeakUp platform, and more than 64,000 reports through our incident reporting system.

No confirmed cases of modern slavery or forced labour were reported across our operations and supply chain.

Case studies: preventing human trafficking in operations

The case studies below demonstrate the important role our frontline employees play in identifying and preventing human trafficking and highlight the effectiveness of our awareness and training programmes.

Case study #1: Johannesburg O.R. Tambo (JNB)

Members of our JNB passenger services team identified and responded to a suspected human trafficking incident involving a child.

After recognising several potential warning signs including inconsistencies in the child's account, our colleagues followed safeguarding procedures and escalated their concerns to the airport police.

Their professionalism and prompt action enabled law enforcement to investigate and ensure the child's safety.

Case study #2: Amsterdam Schiphol (AMS)

A member of our AMS customer service team identified concerns relating to a woman and child travelling together.

During the boarding process, our employee recognised several potential warning signs and acted quickly to escalate their concerns to the Royal Netherlands Marechaussee (KMAR).

Their vigilance and confidence to speak up resulted in a confirmed case of human trafficking and the arrest of two individuals.

Case study #3: Gothenburg (GOT)

Our team at Gothenburg (GOT) Airport supported local law enforcement during a suspected human trafficking incident involving a departing passenger.

After boarding had been completed, our colleagues in operations control and at the aircraft worked quickly to assist the police, reopening the aircraft doors and identifying the correct passenger.

This swift and decisive response allowed police to safely remove and arrest the passenger before departure.

Progress during 2025 and future priorities

During 2025, we continued to strengthen our approach to identifying, preventing and addressing modern slavery risks across our operations and supply chains.

2025 progress	2026 objectives
Third Party Risk Management (TPRM)	
Delivered further enhancement of the Third-Party Risk Management (TPRM) programme, supported by Deloitte. Conducted a global supplier risk assessment, categorising our 12,000 suppliers based on geography, supplier category and spend.	Continue embedding and optimising the TPRM programme, with a focus on supplier risk segmentation. Improve tracking of supplier acceptance of the Third-Party Code of Conduct. Improve visibility and understanding of our supply chain, indirect suppliers and subcontractor relationships.
Supplier engagement & capability building	
60 of our suppliers participated in our first cohort of the UN Sustainable Suppliers training programme. Delivered our first Menzies Aviation suppliers webinar, focused on strengthening understanding of our sustainable supplier expectations.	Support a second cohort of suppliers through the UN Global Compact Sustainable Suppliers Programme. Deliver a second enhanced Menzies Aviation Sustainable Suppliers Webinar.
Governance & risk management	
Further integrated modern slavery and human rights risks into enterprise risk management frameworks, improving oversight, accountability and alignment with internal risk processes.	Improve the quality and availability of modern slavery and human rights data to support more effective KPI reporting. Enhance oversight by incorporating modern slavery and human rights considerations into ESG/HR forums.
Awareness & training	
Continued delivery of modern slavery, human rights and ethical conduct training and awareness activities. Enhancement of training materials and employee engagement across key risk areas.	Ongoing enhancement of training content and targeted guidance for higher-risk roles and geographies. Increase awareness of real-life human trafficking incidents that employees have prevented.
Refugee recruitment & ethical hiring	
Continued collaboration with the Tent Partnership for Refugees and UNHCR, including a joint recruitment event. Refugee employment initiatives active across eight countries, with more than 60 refugees hired during 2025.	Launch our global charity partnership with UNHCR. Increase refugee employment opportunities across existing and new operating locations. Improve monitoring and reporting of refugee data.
Regulatory & industry engagement	
Continued to monitor developments in human rights and fair labour regulation. Began adapting internal considerations in response to emerging regulatory requirements.	Strengthen alignment with ESG reporting frameworks and modern slavery, and human rights legislation. Explore opportunities through industry partnerships and specialist organisations to achieve best practice.



Right to information

Customers and other stakeholders have the right to request further information in relation to this Statement, including our approach to human rights and decent working conditions, and our due diligence processes.

Requests will be managed through internal processes and responded to within applicable legal timeframes, with coordination across legal, compliance and ESG functions.

Requests should be submitted to: menzies.sustainability@menziesaviation.com

Board approval

This Statement has been approved and signed on behalf of the Board of Directors of John Menzies Ltd and the reporting subsidiaries by John Geddes, Chief Governance & Sustainability Officer and Group Company Secretary.

It has also been approved and signed on behalf of the Board of each subsidiary required to report under the Australian Act by Darren Masters, EVP Oceania & Southeast Asia.



30th June 2025

John Geddes, Chief Governance & Sustainability Officer

On behalf of John Menzies Ltd and the reporting subsidiaries



30th June 2025

Darren Masters, EVP Oceania & Southeast Asia

On behalf of MA (Holdings) Australia Pty Ltd and Menzies Aviation (Ground Services) Australia Pty Ltd