



# Modern Slavery Statement FYE 31.12.22

July 2023

**People. Passion. Pride.** Since 1833.



# Our Statement

## Purpose

This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “UK Act”) and the Australian Modern Slavery Act (Commonwealth) (the “Australian Act”) (together the “Acts”) and is published on behalf of John Menzies 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 (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 2022.

It details our approach and the steps we have taken to address modern slavery and human trafficking risks and to ensure that slavery and human trafficking do not occur in our supply chains or any part of our operations.

## Consultation

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

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

Our governance and compliance procedures including due diligence, training and policies are set by the Company and cascaded to all Subsidiaries setting the standards that must always be followed globally. Ultimate responsibility for all Subsidiaries rests with our Company Board of Directors. The Board of Directors of each of the Subsidiaries are aware that this statement is being made on their behalf and have been given the opportunity to participate in the preparation of this statement. Approval and sign off is provided by the relevant Director’s of the Company and its qualifying subsidiaries at the end of this Statement.

## An Ethical Approach

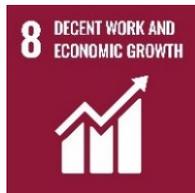
Modern slavery can take many forms of human rights abuses and exploitative practices, examples of which include human trafficking, forced or compulsory labour, child labour, slavery and servitude, debt bondage, full or partial restrictions on freedom of movement, withholding and non-payment of wages 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 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. This included updates on our progress against goals 5 Gender Equality and 8 Decent Work and Economic Growth, which specifically relate to tackling modern slavery and human trafficking.



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

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



Targets and initiatives aimed at supporting human rights are captured in our 'People' and 'Safety' pillars, and more specifically for modern slavery under our 'Legal and Ethical' pillar. 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 2026
- 100% of our suppliers to be assessed for modern slavery risk in 2023



Menzies Aviation were pleased to become a member of Tent in December 2022. Tent connects businesses with government agencies and organisations who work with people that have refugee status. With the support of Tent, we are setting up recruitment programmes and partnerships in Europe, UK, the US and Canada to recruit and support refugees into our business.

During 2022, we successfully onboarded around 20 Ukrainian workers within our European operations who were displaced due to the conflict in Ukraine, providing them with additional support including local language training, to help them integrate into local communities and the workplace.

With more and more refugees being forcibly displaced for longer periods of time. We understand some of the barriers people face entering the workforce and believe that as a global employer we have a role to play in helping refugees and displaced people integrate economically in their new host communities.

## Our Business Structure & Operations

Established in 1833 in Scotland, Menzies Aviation is headquartered in London, United Kingdom, and is now the leading service partner to the world's airports and airlines, with operations at more than 250 airports and 60 countries on six continents.

We became the largest aviation services company by number of countries when we joined forces with National Aviation Services in August 2022, under the ownership of Agility.

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.



 = where we operate

## Core Services & Customers

### Ground Services

We provide time-critical airport services, ensuring passengers, crew and aircraft complete journeys efficiently and on schedule. Every passenger journey can have multiple seen and unseen interactions with our teams and we always do our best to deliver a safe and trusted service alongside a world-class passenger experience.

Our services include:

- Passenger services from check in to boarding.
- Lounges and Meet & Assist.
- Ramp handling and baggage.
- De-icing aircraft.
- Aircraft cabin cleaning.
- Engineering.
- Fixed Base Operations

### Fuel Services

We are the world's largest independent provider of into-plane fuelling services and fuel farm management for oil companies, airports, airlines and other partners. Managing the refuelling of aircraft and the infrastructure required to support this service is a precision activity which must operate to exacting 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. Decades of experience, supported by cost-effective and innovative logistics solutions, means we are trusted to provide a reliable and secure service.

We provide:

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

## 2022 At a glance

- 2m > Cargo tonnes handled per year
- 1.1m > Aircraft turns per year
- 3.6m > Fuelling turns per year
- 250 > Freight forwarding network partners
- 500+ > Airline customers globally
- 58+ > Lounge locations
- 250+ > Airports
- 60+ > Countries
- 40k+ > Employees globally

## Structure

The Company is managed on a geographical basis primarily in four regional segments: Americas, Middle East, Africa and Asia, Europe and UK, and Oceania & South East 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 increased from over 27,000 in 2021 to approximately 36,000 employees by the end of 2022, and now currently numbers over 40,000. Our employees are further supported by agency workers in many of the 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 business can be found in our Annual Review and Sustainability Report 2022: <https://annualreview2022.menziesaviation.com/>

## Global Supply Chain

Our global supply chains rely on a number of key business partners and suppliers including, but not limited to, sectors including consultancy and professional services, cleaning and security companies, labour and agency providers, equipment providers, IT solutions, infrastructure and hardware, uniform and PPE providers, de-icing suppliers, aircraft fuel companies, catering/food and drink providers, other aviation services providers.

Our local entities in each of the countries we operate engage with many local suppliers as well as global suppliers. During 2022 we completed a new categorisation process of our supplier population to provide consistency and support improved analysis and risk assessment processes.

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

While around 50% of our supplier population is located in the five countries below, the geographical spread is changing, with an increasing number of suppliers in Latin America, and other regions, as our business grows.

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

Within Australia, our main suppliers include, but are not limited to: Cabin Services Australia who provide aircraft cabin cleaning services; Blue Collar Recruitment who are an aviation services labour provider; Wymap Group who provide labour and trucking solutions; our ground services equipment providers such as TCR and Linde, are also significant, along with fuel providers (for equipment and vehicles) and uniform providers. We also rely on many third parties for IT services, office supplies and office cleaning. We have continued to rely on

an increased level of engagement with labour providers over the last 2-3 years, initially as we responded to the impacts of Covid, and since then to support our growing business. Contract resource is necessary as we have faced 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.

## Australian Operations

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 2,200 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 AirSupport Pty Ltd are all registered labour hire providers in Victoria, Australia, in accordance with local legislation.

## Our Australian entities in scope for this report

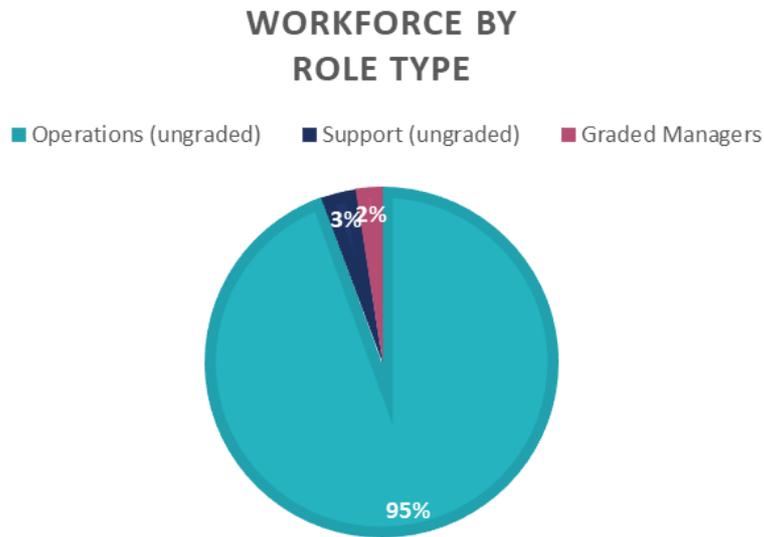
- Menzies Aviation (Australia) Pty Ltd
  - Gold Coast Air Terminal Services Pty Ltd
  - Menzies Aviation Cairns Pty Ltd
- Menzies Aviation Holdings (Australia) Pty Ltd
  - Menzies Aviation (Ground Services) Pty Ltd
    - Australian Air Support Pty Ltd
  - Air Menzies International (Aust) Pty Ltd
  - Skystar Airport Services Pty Ltd
  - Perth Cargo Centre Pty Ltd

## Our Workforce in Australia

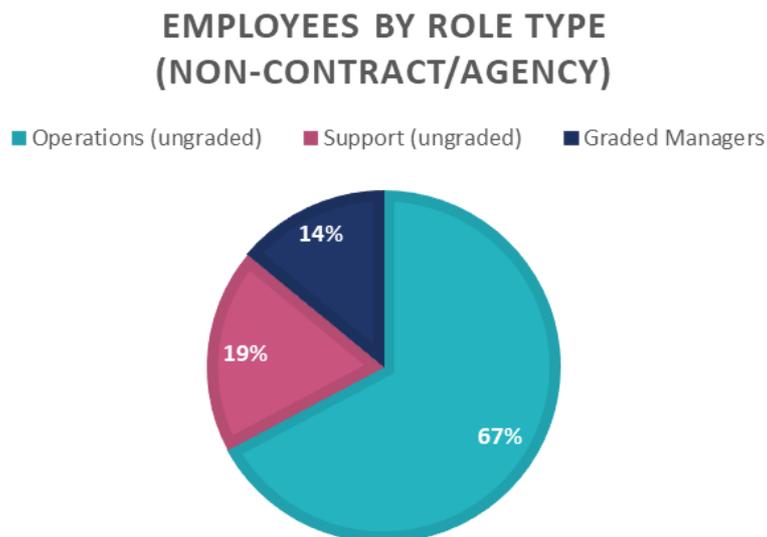
85% of our workforce in Australia is contract/agency resource.

Location (Airport)	Total Employees	Contract/Agency
Adelaide (ADL)	94	0
Brisbane (BNE & WTB)	439	419
Cairns (CNS)	51	0
Darwin (DRW)	100	95
Kalgoorlie (KGI)	16	15
Karratha (KTA)	37	36
Melbourne (MEL)	477	7
Gold Coast (OOL)	25	
Perth (PER)	293	281
Sydney (SYD)	641	620
Regional Management Teams	55	
<b>Totals</b>	<b>2228</b>	<b>1473</b>

The charts below show the split of role types for Menzies whole Australian workforce (*Fig.1*), and for our directly employed workforce (*Fig.2*).



*Fig.1*



*Fig.2*

Figures correct at date of publication.

## Modern Slavery Risk Management Framework

It is important to us that we lead by example and demonstrate to our own stakeholders that we set and operate to the highest standards, acting responsibly and ethically at all times. In accordance with this, we expect the same of our own third parties, including suppliers, contractors, consultants (our “Suppliers”) and joint venture partners.

We therefore seek to ensure that we engage only with those Suppliers who uphold the values to which we adhere and require that all our Suppliers, through contractual commitments, act ethically and with integrity at all times, sharing our commitment to humane and safe working practices.

We work with many Suppliers across the globe, many of whom are critical to our success. We acknowledge some of these Suppliers may operate in sensitive industries and countries (as identified in the Global Slavery Index) and the risk of modern slavery may be greater in some areas than in others. This is considered within our overall risk assessment process along with information from other relevant resources including Transparency International, the UN Global Compact and the TRACE matrix, which provides an indication of corruption perceptions. In Q4 this year, we will additionally utilize the [The Workplace Rights Index](#) as a reference within our Third Party Risk Management system.

We monitor the risk of human rights breaches, fair labour and modern slavery within our overall approach to identifying risks across our business. As part of this, we identify categories of suppliers who may pose a higher risk from a modern slavery perspective including our uniform and PPE suppliers, suppliers of temporary/short-term labour, service providers such as cleaning contractors, as well as information technology suppliers. These category factors also inform our risk assessment process and help ensure we focus due diligence and assessment efforts in the best way.

All our Suppliers are expected to be able to demonstrate and provide evidence where appropriate, of the standards they adhere to and to complete a level of risk-based due diligence. In some circumstances this may include audits and independent verification of standards.

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 are implementing new audit and controls for employee accommodation and onboarding of migrant and refugee workers in 2023.

Risks relating to modern slavery, fair labour and human rights are then captured and monitored as part of our overarching enterprise risk management framework and entered, reported on and tracked in our online risk registers.

## **Risks of Modern Slavery Practices within our Operations and Supply Chains**

As identified in our last report, we understand that there are risks of modern slavery practices occurring within our business, supply chains and operations. Identification of risks is done through understanding our operations, the geographies in which we operate and our supply chain, as well as understanding external social factors of where such risks are most likely to occur.

We have reviewed our risks based on our assessment in our last report, of the risks of modern slavery practices that could arise in relation to our operations, as well as our supply chains. We have noted changes below, and we have set out some of the measures we have taken and continue to take to address those risks.

1. We have identified a heightened risk within our own operations as we have introduced new employee accommodation facilities that support migrant workers in some locations, and due to the increase in our operations in typically higher risk geographies, including the Middle East.
2. As our population grows and we continue to engage labour through agency arrangements, there remains a heightened risk, particularly where those resources are engaged on a temporary basis as opposed to becoming our own permanent employees.
3. We are mindful of the conflict in Ukraine and other geographies continuing to create increasing numbers of displaced and vulnerable individuals and families. We are working with organisations to recruit and support refugee workers in a number of locations across our global operations. New procedures and controls are being implemented to mitigate associated risks.
4. While we identify a potential risk in our own employee populations where we are directly recruiting employees, we believe this continues to be negligible. We have robust recruitment processes and onboarding procedures in place and always respect the rights of employees, including the right of freedom of association and collective bargaining. We do believe that we can enhance our internal audits and checks to provide greater certainty on the level of risk.

Modern Slavery Risk	Potential Issues	Actions Taken to Assess and Address Risks
<p><b>Directly employed staff</b></p>	<p>Staff employed without following recruitment processes which include appropriate background checks for suitability and ability to work lawfully in the relevant jurisdiction and to ensure appropriate payment.</p> <p>Onboarding new employees from businesses we partner with or acquire.</p> <p>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 refugees workers through the recruitment and onboarding process, as well as extra support to help them become part of the local community.</p>

		Provide recruiters, managers and co-workers with training and guidance for supporting refugee workers successfully into the workplace.
<b>Employee Accommodation</b>	<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 employees contract or role could contravene fair labour and employment standards and laws.</p>	
<b>Labour providers and service providers</b>	<p>Engaging with labour providers who are themselves engaging in modern slavery, including, underpaying staff wages and employee entitlements.</p> <p>Employee misclassification.</p>	<p>Detailed analysis and reporting on our supplier population by category, geography and analysis of risks supported by our new system.</p> <p>Engage more fully with our suppliers through our new onboarding system and processes.</p> <p>Improved supplier due diligence and assessments including assessment of whether provider may themselves have Modern Slavery reporting obligations, which we can review.</p> <p>Ensure awareness of our Third Party Code of Conduct and the obligations on our suppliers.</p> <p>Potential for undertaking our own or requesting independent audits.</p>
<b>Suppliers &amp; Sub-contractors</b>	Engaging with suppliers who are engaging in modern slavery practices including, underpaying staff wages and employee entitlements or engaging in human trafficking.	We set out our actions in relation to suppliers below.
<b>Indirect risks within our supply chain</b>	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.	We set out our actions in relation to these categories of suppliers below, including enhanced due diligence and evidence of independent audits. We may also undertake our own audits, where appropriate.

## Actions for Managing and Mitigating Modern Slavery Risks

### Policies, Procedures and Compliance

Our approach to protecting and protecting human rights, fair labour and preventing modern slavery forms a core part of our All In plan and our company policies and procedures, with the full support of our John Menzies Ltd. Our programme and policies apply company-wide including all our subsidiaries and sister companies. The ultimate responsibility is owned by our John Menzies Ltd Chief Governance & Sustainability Officer.

Our All In programme, 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 programme contains key policies, procedures, training and controls to ensure it is effective in meeting these requirements and ensuring our compliance with legislation and ethical conduct.

Our Sustainability Programme sets goals and commitments across environmental, social and governance topics that are material for our 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.

Our Code of Conduct is available in 18 languages and remains at the heart of our suite of ethical and legal policies and is updated regularly to ensure it remains up to date and reflective of the changes that matter for our business, legislatively, socially and culturally. It aims to create and support a culture of ethics, integrity, respect, pride and excellence in our organisation, providing a framework for 'doing the right thing, at the right time'. It is intended to provide our People, at all levels of our organisation, with the awareness and understanding of the values and behaviours expected of them and what they can expect in return as an employee. It acknowledges the rights of our people to engage in collective bargaining as well as other areas relating to protecting their rights. It also covers key areas of ethics and compliance, including modern slavery and human trafficking, human rights, equality, diversity and inclusion, and anti-bribery and corruption amongst many other topics.

Our Code of Conduct is being further revised in scheduled to be re-issued to all employees globally in Q3 2023. Code of Conduct training is also being updated for re-issue in Q1 2024.

Since our last report we have significantly refreshed our Anti-Slavery and Human Trafficking Policy, which is now renamed as our Human Rights and Fair Labour Policy. This is also available in 18 languages, reflecting our growing business and increasingly diverse employee population. We have also introduced a new Employee Accommodation Policy, which 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.

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, and SpeakUp to name a small few.

## Contractual Controls and Due Diligence

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 suitable provisions within our Supplier contracts relating specifically to modern slavery as well as our Third Party Code of Conduct more generally. We review Supplier contracts and, where possible/if considered appropriate, strengthen their terms to further limit the likelihood of slavery or human trafficking occurring in our supply chains or any part of our business.

Our Third Party Code of Conduct forms part of all new Supplier contractual arrangements and we actively ensure it is included in any contract renewal processes for existing Suppliers. A further revised version is being issued to all suppliers in Q3/Q4 2023.

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 human rights and fair labour, prior to entering into a relationship with any Supplier who may be considered high risk and/or who operates in a higher risk region(s).

Our new Third Party Risk Management (TPRM) system has been configured with the support of Deloitte and has links to external databases with the specific aim of enabling supplier risk assessment, due diligence, onboarding and ongoing continued monitoring. Accompanying the new system are new supporting procedures, risk assessments and controls, including a specific focus on human rights, fair labour and modern slavery risks. As part of the implementation, we are contacting our global supplier population, notifying them of the new risk-based due diligence procedures they may have to complete. Our new solution will deliver consistency, quality and transparency across our whole supplier population and better assist us in our ongoing monitoring activities and analysis.

We are committed to undertaking human rights and fair labour/modern slavery risk assessments in our new system by end 2023 for our global supplier population.

Reflecting the number of increasing legislative requirements relating to supply chain risk assessment and due diligence, particularly in Europe, we will continue to adapt our processes and systems to ensure compliance and best practice.

Our due diligence of new joint venture partners or companies we acquire is a robust and mature process and includes an assessment of modern slavery risk in addition to all other aspects of due diligence, to ensure we understand business risks and practices. Our integration activities ensure that our policies and training are implemented within any new operations and expectations are clear for all new partner and employees.

## Grievance and Remediation

We offer many channels for seeking guidance, reporting concerns and raising grievances including our independent whistleblowing hotline, which we have had in place across our global network since 2016. Our current whistleblowing hotline service is called 'SpeakUp'.

Our SpeakUp service offers reporters the ability to raise any issues or concerns anonymously and confidentially around unethical conduct, malpractice, illegal acts or failures, including human rights' violations such as slavery or human trafficking. We encourage everyone working with us and on our behalf to use the service in confidence and that their concern will always be taken seriously, treated confidentially and fully investigated. Our service allows us to engage with a reporter via the SpeakUp system without them having to disclose their contact details or identity, enabling us to better investigate any reports made and confirm back to reporters when investigations are concluded.

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

Our SpeakUp Policy and Guidance 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.

We continue to experience an increase in reports from 2021, 2022 and into 2023, spurred by increased awareness of the facility, which is very positive. The increased awareness gives us confidence that our communications are effective, more people feel comfortable making a report and as a result, 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 o report this to the relevant authorities, where appropriate,

## Training

We have been providing Anti-Slavery and Human Trafficking Awareness e-learning to all our employees since 2019. This is designed to increase awareness of modern slavery and human trafficking to ensure our People are better equipped to spot and report any concerns that may arise in the course of their work for us as well as in their personal lives. Within this we incorporated a short video produced by one of our airline industry partners, the International Air Transport Association (IATA), as part of their #eyesopen campaign to fight human trafficking. This has recently been reviewed and integrated into our induction learning for all employees, rather than a standalone module.

Our Code of Conduct e-learning module, which was launched in early 2021 for all Company employees, is designed to provide all our employees with a good awareness and understanding of ethical conduct as well as core policies, procedures, legal obligations, and the behaviours we expect of them. This module also includes appropriate reference to and reinforcement of our zero-tolerance position on modern slavery and human trafficking. As with all our compliance-related training, it has been made available in a number of languages to ensure it is as accessible as possible for all our employees.

Both our Code of Conduct and Anti-Slavery and Human Trafficking Awareness e-learning is being refreshed and updated to provide greater awareness of Fair Labour practices, amongst other areas for Q1 2024.

In addition, we are creating new guidance and training for those who onboard workers including specific new guidance on recruiting and onboarding refugees as employees.

Those employees responsible for selecting and onboarding new suppliers will receive training and guidance on our new TPRM system and processes. This includes awareness of a new sustainable procurement guidelines.

## Measuring Performance

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

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. Our new learning will be monitored in the same way. We also request read and sign of 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 (previously Anti-Slavery and Human Trafficking 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 these elements of our Audit Programme regularly and incorporate any improvements or additions as new procedures and controls are embedded. Where issues are identified in the course of our Audit Programme, we will require that immediate remedial steps are taken to ensure compliance or, if necessary, relationships with Suppliers will be terminated. We also review our Code of Conduct and other policies and procedures regularly to ensure that they continue to remain appropriate.

3. Our new Third Party Risk Management solution will provide greater oversight of our supplier population, 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. New controls and checks to monitor compliance will include physical audits and checks of employee accommodation annually and/or on an ad-hoc basis. This will include some unannounced checks. We are also reviewing new controls for monitoring recruitment procedures, particularly in those areas where we may consider there to be a higher risk.
5. SpeakUp offers another way for us to monitor for any reports of wrongdoing raised by employees, agency workers and contractors or other third parties.

We did not identify any International Labour Organization (ILO) indicators of modern slavery anywhere in our own operations or supply chain during 2022.

## Key Areas of Action 2023-2024

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 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	2023 Steps	2024 Steps
<b>Continue to develop and expand our Supplier due diligence and Third Party Risk Management procedures and solution.</b>	Complete a modern slavery risk assessment for 100% of suppliers in our global supplier population.	Review the effectiveness of our new solution and adapt as required. Review monitoring of suppliers via our new solution.

	<p>Roll out the new solution globally and</p> <p>Introduce auditing procedures for higher risk for suppliers.</p> <p>Ensure all suppliers are made aware and receive our updated Third Party Code of Conduct.</p>	<p>Ensure all required suppliers successfully complete human rights, fair labour and</p>
<p><b>Develop increased transparency on the geographical spread and categorisation of our Supplier population and deeper analysis across the tiers.</b></p>	<p>Following the introduction of our new supplier categorization, further refine our reporting and develop more insights from our new Third Party Risk Management solution.</p>	<p>Further detailed analysis of risks based on improved insight of our supplier population and consider any actions we can take to reduce risk or improve quality or auditing.</p>
<p><b>Develop our refugee onboarding programme and improved processes and monitoring for the recruitment of migrant workers.</b></p>	<p>Work with Tent and other NGOs and partner organisations to ensure we develop and deploy best practice procedures and guidance for the safe recruitment and onboarding of refugees.</p> <p>Further develop our monitoring and controls for employee accommodation.</p>	
<p><b>Seek new opportunities and ways to better collaborate with our business and industry partners that help us build on best practice and incorporate learnings.</b></p>	<p>Seek more engagement opportunities and understand what our partners and customers are developing in this space.</p>	<p>Review the need to provide learning and support to our supplier population in this area.</p>
<p><b>Continue to develop and create awareness of modern slavery and other human rights risks across our Company.</b></p>	<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>Implement new actions to support human rights more fully within the Company and supply chains.</p>
<p><b>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.</b></p>	<p>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.</p>	<p>Continue to adapt and ensure compliance with all new human rights and fair labour regulation and legislation and reporting and disclosure requirements.</p>

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.



30<sup>th</sup> June 2023

**John Geddes**

**Chief Governance & Sustainability Officer**



30<sup>th</sup> June 2023

**Darren Masters Director**

**MA (Holdings) Australia Pty Ltd**



30<sup>th</sup> June 2023

**Alistair Reid**

**EVP Oceania and South East Asia**

**Menzies Aviation (Ground Services) Australia Pty Ltd**

