



MENZIES DISTRIBUTION

2 Lochside Avenue
Edinburgh Park
Edinburgh
EH12 9DJ

T: +44 (0) 131 467 8070
F: +44 (0) 131 469 4797

www.menziesdistribution.com

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

ADOPTED FEBRUARY 2019

AROUND THE CLOCK, AGAINST THE CLOCK



VERSION CONTROL AND DOCUMENT GOVERNANCE

Document Title	Anti-Slavery and Human Trafficking Policy
Location	Edinburgh Park
Version	1.0
Level	Board Level
Owner / Position	Pamela Abbott, Head of Legal, Compliance and Secretariat
Reviewed By	Pamela Abbott
Approved By	Pamela Abbott
Approval Date	1 st March 2019
Review Period	Annually
Next Review	1 st March 2020

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It involves the deprivation of an individual's liberty by another in order to exploit them for personal and/or commercial gain.

Menzies Distribution Limited and all its subsidiary companies (together the "**Menzies Distribution Companies**") are committed to promoting human rights and conducting business ethically and with integrity at all times. The Menzies Distribution companies have a zero-tolerance approach to any form of Modern Slavery: Modern Slavery is against our core values and standards and the presence of Modern Slavery in any part of our business or supply chains will not be tolerated.

The Menzies Distribution Companies will endeavour to ensure that they comply with all applicable laws, regulations and relevant standards relating to Modern Slavery in all its operations, including the Modern Slavery Act 2015 (the "**MSA 2015**"). We are committed to ensuring there is transparency in our business and in our approach to tackling Modern Slavery throughout our supply chains, consistent with best practice. More broadly, the Menzies Distribution Companies will take steps to ensure that they do not benefit directly or indirectly from Modern Slavery or other breaches of human rights in their operations.

In accordance with the requirements of the MSA 2015, Menzies Distribution Limited will publish an Anti-Slavery and Human Trafficking Statement annually on its website and this will detail the steps taken in the financial year in question to ensure that Modern Slavery is not occurring in any part of the business or supply chains of Menzies Distribution Companies.

DEFINITIONS

For the purposes of this Policy:

"Business Partner" means any customer, contractor, sub-contractor, consultant, agent, supplier or joint venture partner of any of the Menzies Distribution Companies.

"Employee" means all persons working for us on our behalf in any capacity, including Employees at all levels, directors, officers, agency workers, seconded workers, volunteers and interns.

"Modern Slavery" means slavery, servitude, forced or compulsory labour and human trafficking.

SCOPE

This Policy applies to all Menzies Distribution Companies and their Employees. This policy explains what is expected of you. You must act in accordance with the terms of this Policy and according to the spirit and the values it embodies in whatever you do for the Menzies Distribution Companies.

We are committed to working only with Business Partners whose business ethics and behaviours are consistent with this Policy. In respect of such Business Partners, we will seek to encourage and ensure equivalent compliance.

This Policy does not form part of any Menzies Distribution Companies' Employee's contract of employment and may be amended by Menzies Distribution Limited, in its absolute discretion, at any time.

You must ensure you always reference the current version of this Policy. Where this Policy makes reference to other Menzies Distribution Companies policies and procedures, you must review and consult them for more detailed information and guidance.

OUR APPROACH TO MODERN SLAVERY

We have a zero-tolerance policy for Modern Slavery in our organisation or supply chain and we are committed to working with our Employees and Business Partners to address the risk of Modern Slavery in our business or supply chain.

We take a risk based approach and assess whether the circumstances of specific elements of our business warrant the need for additional investigation or protections to prevent Modern Slavery.

Consistent with this risk based approach, we will require Business Partners and Employees to remain vigilant to the possibility of Modern Slavery, and confirm compliance with this Policy.

RESPONSIBILITY

Whilst ultimate responsibility for the Menzies Distribution Companies' compliance with its Modern Slavery-related legal and ethical obligations rests with the Board of Directors of Menzies Distribution Limited, the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all those working for us, on our behalf or under our control. Accordingly, any activity that might lead to, or suggest, a breach of this Policy must be avoided.

All staff must ensure that they read, understand, and comply with this Policy. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

The Head of Legal, Compliance and Secretariat and Senior Managers are responsible for ensuring that everyone in the Menzies Distribution Companies understands and complies with this Policy on a day-to-day basis. Such responsibility includes ensuring the communication of our zero-tolerance approach to Modern Slavery in our business and supply chains to all Business Partners at the outset of any business relationship.

This should be reinforced by requiring Business Partners to both sign up to specific contractual provisions, as advised by the Head of Legal, Compliance and Secretariat of Menzies Distribution Limited.

TRAINING

Employees of Menzies Distribution Companies and, where appropriate, certain Business Partners deemed will be required to participate in training sessions regarding Modern Slavery on an annual basis. Such training sessions may include a review of this Policy and may be conducted live or online, at such times as deemed necessary or desirable including through the Menzies Distribution Companies' learning management system. The purpose of this training will be to assist participants in understanding what constitutes Modern Slavery, identifying indications of possible Modern Slavery and providing guidance as to what to do in such circumstances.

REPORTING A VIOLATION

Any known, suspected or potential violation of this Policy must be reported promptly to your Line Manager or to Legal Compliance

Employees must bring any known, suspected or potential violations of this Policy to the immediate attention of Menzies Distribution Limited. You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any part of the Menzies Distribution Companies business or supply chain at the earliest possible stage.

We will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern

slavery is or may be taking place in any part of our business or in our supply chain. If you believe that you have suffered detrimental treatment, you should inform the Head of Legal, Compliance and Secretariat immediately.

BREACHES OF THIS POLICY

Failure to adhere to this Policy may lead to disciplinary action, up to and including termination of employment or termination of a business relationship.

The Menzies Distribution Companies may terminate their relationship with any individual or organisation working on their behalf who breaches, or who is reasonably suspected of having breached, this Policy, or who, having been given, in appropriate circumstances, an opportunity to remedy any failings and improve to an acceptable standard, has not done so.

MONITORING AND RISK ASSESSMENT

The suitability and adequacy of this Policy and responses to particular issues will be reviewed periodically. Menzies Distribution Companies' compliance with this Policy, and, where appropriate, that of Business Partners, will be monitored through a combination of methods, including internal auditing of control systems and procedures to ensure they are effective in countering Modern Slavery and periodic risk assessments. Such risk assessments will be used to identify both specific areas where there may be heightened risk and those Business Partners in our supply chains who could be considered to present higher risk, with a view to understanding the controls they have in place and the operation and adequacy of such controls.

All Employees of the Menzies Distribution Companies will be required to confirm that they have read and understood the requirements of this Policy.

The Head of Legal will be responsible for ensuring the investigation of any reported violations of this Policy and reporting any findings to the Board of Directors of Menzies Distribution Limited.

Any queries concerning this Policy should be addressed to the Head of Legal, Compliance and Secretariat of Menzies Distribution Limited at: legal@menziesdistribution.com.