



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

**MENZIES DISTRIBUTION LIMITED
FEBRUARY 2019**

PURPOSE

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and is published on behalf of Menzies Distribution Limited (the “Company”) and its wholly owned subsidiary EM News Distribution (NI) Limited (the “Subsidiary”), each carrying on business in the UK and having a turnover in excess of £36 million. References in this Statement to “we”, “us” or “our” are to both the Company and its Subsidiary.

This is our updated statement for the financial year ending 31 December 2018 and it details the steps taken by us to ensure that slavery and human trafficking do not occur in our supply chains or any part of our business.

OUR BUSINESS

The Company operates one of the largest overnight logistics networks in the UK and Ireland, providing final mile delivery for over 100 million delivery units each year and serving customers in the press, travel and third-party logistics sectors. In addition to its core role within the UK print media supply chain, delivering over five million magazines and newspapers every day, the division is expanding into both UK retail logistics and neutral consolidation within the fast growing parcel delivery market.

The Subsidiary

We comply with applicable legislation relating to employee terms and conditions, and none of our staff earn less than minimum wage.

SUPPLY CHAINS RISK ASSESSMENT

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 and in our approach to tackling modern slavery throughout our supply chains.

We work with a large number of third parties, including contractors, suppliers and business partners, across the globe (our “Suppliers”), 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 2016).

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.

Whilst we are not aware of any incidents of modern slavery within our supply chains or any part of our business to-date, we intend to undertake further risk assessments and analysis across our organisation to ensure consistency, comprehensiveness and quality in the manner and mode of Supplier assessment, both pre and post-engagement.

POLICIES, PROCEDURES AND COMPLIANCE

We take our responsibilities seriously and aim to demonstrate our commitment to operating fairly, honestly and in compliance with all applicable legislative, regulatory and ethical requirements and believe we must foster a culture in which integrity and responsible and ethical values are at the very core of all our activities and decision-making processes and any abuse of human rights, either within our business or by anyone employed by or associated with it, will not be tolerated.

During 2018 we appointed a Head of Legal, Compliance and Secretariat who is responsible for overseeing our compliance programme, which has the full support of our Board.

A key focus of our Compliance Programme will be to review, refresh and improve certain of our compliance policies, procedures, training and controls, and to seek improved engagement with our People and our Suppliers.

We are committed to ensuring that our business operates ethically at every level and that our People and Suppliers understand and share this commitment.

Our recently launched Group Anti-Slavery and Human Trafficking Policy and Anti-Bribery and Corruption policies detail our zero-tolerance approach to any form of slavery or trafficking in our supply chains or any part of our business.

CONTRACTUAL CONTROLS AND DUE DILIGENCE

Our zero-tolerance position in relation to slavery and human trafficking is further supported through our continued objective to incorporate suitable provisions within our Supplier contracts. We will continue to review both future and current Supplier contracts and, where 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 adopt a risk-based approach to due diligence and have been working on adapting and enhancing our due diligence processes on a range of issues, including modern slavery and human trafficking, prior to entering into a relationship with any Supplier who may be considered high risk and/or operates in a higher risk region(s). We wish to ensure consistently high standards are applied when undertaking risk assessments and due diligence across our organisation and will continue to work on improving this process. Where deemed appropriate, expert external providers are engaged to support us in undertaking such diligence.

TRAINING

All employees are currently required to undertake online Governance training through our learning management system which reinforces the behaviours we expect of all our People, the repercussions of failing to adhere to such standards and the steps employees should follow to report potential breaches of our policies. All new employees will undertake this training as part of their onboarding process and annually thereafter.

MEASURING PERFORMANCE

We have not yet adopted any specific modern slavery performance indicators, but we seek to identify means of measuring effectiveness and reporting. Our aim in 2019 is to achieve this through increased engagement and communication across our organisation and with our Suppliers.

As noted, we will continue to keep our supply chains under review to identify and monitor ongoing and future risks. Drawing on best practice, regulatory requirements and/or industry guidance which may develop, we will seek to strengthen our measures to detect and prevent slavery and human trafficking taking place in our supply chains or any part of our business.

BOARD APPROVAL

This slavery and human trafficking statement for the financial year ending 31 December 2018 has been approved by the Board of Menzies Distribution Limited and signed by XXXXXX