



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

**MENZIES DISTRIBUTION LIMITED FOR AND ON BEHALF OF THE
MENZIES DISTRIBUTION GROUP COMPANIES
DECEMBER 2023**

PURPOSE

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and is published by Menzies Distribution Limited on behalf of Menzies Distribution Limited (and its subsidiary companies, including its wholly owned subsidiary EM News Distribution (NI) Limited (“EMNDNI”)) and Menzies Distribution Services Limited (and its subsidiary companies, including its wholly owned subsidiary Menzies Distribution Solutions Limited) (together the “Menzies Distribution Group Companies”) 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 all of the Menzies Distribution Group Companies.

This is our updated statement for the financial year ending 31 December 2023 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 Menzies Distribution Group Companies operate 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 provides distribution, logistics and warehousing services across multiple sectors within the UK and Ireland and wider into mainland Europe. The Menzies Distribution Group Companies additionally provide and services customers in the press, travel and third-party logistics sectors.

The Menzies Distribution Group Companies 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 continue to undertake 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. Where our Suppliers operate in sensitive industries and countries, we undertake enhanced risk assessments and monitoring measures to ensure that slavery and human trafficking does not occur in our supply chains.

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, responsibility 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.

Our Chief Legal Officer is responsible for overseeing our compliance programme, which has the full support of our Board.

A key focus of our Compliance Programme is 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 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. We operate an open culture which encourages our employees to raise any issues or concerns in respect of slavery and human trafficking at the earliest opportunity.

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). In December 2021, we implemented a Supplier Code of Conduct asking our Suppliers for commitment and their support in four key areas; Putting Safety First, Environmental Responsibility, Social Responsibility and Conducting Business with Integrity and Fairness.

In November 2022, we also implemented an Environment and Social Governance (ESG) Colleague Code of Conduct. All Menzies Distribution Group colleagues must acknowledge the significance of social, environmental and ethical trading matters in their conduct, and to work tirelessly towards improving our standards and performance in these areas.

In 2022 we appointed a dedicated Legal Compliance Counsel to set and monitor key performance indicators across all Menzies Distribution Group Companies. Where deemed appropriate, expert external providers are engaged to support us in undertaking such diligence.

TRAINING

All employees are still required to undertake online anti-slavery and human trafficking training through our learning management system which reinforces the behaviours we expect of all our employees, 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 undertake this training as part of their onboarding process. All employees are required to undertake this training on an annual basis.

MEASURING PERFORMANCE

We have continued to monitor our performance our progress in preventing slavery and human trafficking through our due diligence processes for new suppliers and our contract review process for all suppliers. Our aim in 2023 is to streamline all Menzies Distribution Group Company Policies and ensure full compliance with all implemented policies. 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 these processes.

This year we aim to fully implement a separate statement against child labour and forced labour as an expression of our commitment and expectations we have for Suppliers worldwide. We are also implementing a freedom of association policy and communicating to our employees. We are committed to creating an ethical workplace, both in terms of how we treat our employees, how our employees treat our customers, our Suppliers and also how we operate within the community.

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 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 2023 has been approved by the Board of Menzies Distribution Limited and signed by Paul McCourt, Chief Financial Officer.