

Slavery and Human Trafficking Transparency Statement for the Financial Year End 28 February 2017

Introduction

Stobart Group Ltd (and all of its operating divisions and subsidiary companies) (together the “Stobart Group”) are committed to ensuring acts of modern day slavery and human trafficking do not exist within its business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Stobart Group’s slavery and human trafficking statement for the financial year ending 28 February 2017.

This statement has been approved by the Board of Directors and signed by Iain Ferguson, the Chairman of Stobart Group.

Company Overview

Stobart Group is one of the UK’s leading infrastructure and support service businesses and is listed on the London Stock Exchange. Stobart Group has over 1000 employees operating across five main operating divisions at sites throughout the United Kingdom and Ireland.

The operating divisions can be summarised as follows:

Stobart Aviation

Aims to deliver a first class passenger experience through its ownership of London Southend Airport, Carlisle Lake District Airport and regional airline Stobart Air.

Stobart Infrastructure

The division has a strong track record of enhancing the value of the group’s assets. It holds our portfolio of commercial properties and our investments in renewable energy plants.

Stobart Rail

Is one of the UK’s leading providers of innovative and efficient rail and non-rail civil engineering projects.

Stobart Energy

Is the number one supplier of biomass in the UK, sourcing and supplying fuel to biomass plants under a mix of short and long-term contracts.

Stobart Investments

As at 2016/2017 financial year end, our Investments division holds an investment of 49% in Eddie Stobart Logistics.

Further details on the divisions can be found at <http://www.stobartgroup.com>

Policies

Stobart Group is committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. The group’s internal policies reflect our commitment to acting ethically and with integrity in all our business relationships and to

implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

All internal policies are reviewed regularly to ensure continued compliance with the Modern Slavery Act 2015 and other applicable legislation.

Stobart Group has in place the following policies which are relevant to the prevention of slavery and human trafficking in its operations:

Corporate Social Responsibility Policy. This policy is designed to ensure that Stobart Group conducts all business responsibly and with the highest ethical and professional standards.

Whistleblowing Policy. Stobart Group encourage all employees to report any concerns related to the activities of the business, including any worries in relation to slavery and human trafficking. The company's whistleblowing policy and procedure is designed to ensure that any matter raised under this procedure will be investigated thoroughly, promptly and confidentially.

Equality & Diversity Policy. Stobart Group is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy, maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

Ethics Policy. This policy is to outline Stobart Group's requirements for conducting business to the highest ethical standard. The Group demonstrates a clear approach to business integrity and ethics, which underlies the company values.

Recruitment Policy. Stobart Group ensures that the process of recruiting employees is fair, consistent, professional and non-discriminatory to both internal and external candidates.

Supplier Adherence to the Stobart Values and Ethics

Supply Chain

Stobart Group considers its supply chain to be at a 'low risk' in relation to modern slavery and human trafficking. Given the nature of the business, there is no significant utilisation of overseas or unskilled labour, being key areas identified as posing a higher risk; imports are of a minimal amount, unskilled labour is of a small quantity and operations are UK based.

Supplier Adherence

Stobart Group demonstrates a zero tolerance to slavery and human trafficking. To ensure that all those within the group's supply chain and contractors comply with our values and ethics we have in place dedicated colleagues within our procurement, sales, audit and human resources teams to ensure compliance with this programme.

The suppliers that Stobart Group and all operating divisions use have been contacted in writing and our expectations have been communicated to them with regard to human trafficking and modern slavery. In order to remain on the Stobart Group approved supplier list, all suppliers have been notified that satisfactory compliance with the provisions of the Modern Slavery Act 2015 is mandatory, and this will be monitored and assessed as part of the regular audits of the Group's supply chain conducted by the Safety & Compliance department.

Stobart Group will update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or own business.

Effectiveness in combating slavery and human trafficking

Any suspected incidence of slavery or human trafficking would be immediately reported to the Executive Board in the first instance. It would then be dealt with appropriately, which may include, but is not limited to, terminating commercial relationships, disciplinary action and notifying the relevant authorities.

Further steps for 2017/18

Stobart Group is reviewing its key performance indicators (KPI's) in light of the introduction of the Modern Slavery Act 2015. As a result, the company is:

- Requiring all managers and HR professionals to have completed training on modern slavery by October 2017.
- Planning a programme to raise awareness to all employees of modern slavery and human trafficking issues, and how to identify and report any issues, by producing information and communicating through the employee intranet site, Stobart Central.



Stobart Group Ltd

February 2017