

Slavery and Human Trafficking Transparency Statement for the Financial Year End 28 February 2018

Introduction

Stobart Group Ltd (and all of its operating divisions and subsidiary companies) (together the “Stobart Group”) are committed to taking appropriate and proportionate steps 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 (‘the Act’) and constitutes Stobart Group’s slavery and human trafficking statement for the financial year ending 28 February 2018.

This statement has been approved by the Board of Directors and signed by Iain Ferguson, the Chairman of Stobart Group. Information contained in this statement is correct to the date of publish.

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 1700 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 along with the provision of ground handling services across other UK airports.

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 & Civils

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, processing and supplying fuel to biomass plants under a mix of short and long-term contracts.

Stobart Investments

As at 2017/2018 financial year end, our Investments division holds an investment of 12.5% 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 they are appropriate, well communicated and promote continued compliance with the Act 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 Group'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, harassment and victimisation 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 outlines Stobart Group's requirements for conducting business to the highest ethical standards. The Group demonstrates a clear approach to business integrity and ethics, which underlies Group 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.

Our commitment – what we do

Supply chain Adherence to the Stobart Values and Ethics

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 and the sectors within which we work, 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 meaning suppliers are already under an obligation to comply with UK law on forced labour.

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.

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.

What we have done in 2017/2018

Following our statement in February 2017, the Group has reviewed its key performance indicators (KPI's) in light of the introduction of the Act. As result, in 2017/2018, Stobart Group took the following action:

- Developed a training session to be completed by all managers and HR professionals. Delivery of this is on a rolling on-going basis, with managers to then roll out and brief their teams to ensure that all necessary personnel are appropriately briefed.
- Conducted a mapping exercise of all our suppliers to establish those who could be classified as most at risk. A letter was then sent to those suppliers considered most at risk confirming our expectation of their compliance with the Act in order to remain an approved supplier.
- Reviewed and updated the standard supplier Terms & Conditions to include contractual modern slavery obligations, thereby placing an increased emphasis on compliance amongst our suppliers.
- Continued to raise awareness amongst employees of modern slavery and human trafficking issues, and how to identify and report any issues. For example, our whistleblowing procedure was updated to make reference to the grievance procedure to ensure increased clarity amongst employees on internal procedures through which they can raise and report concerns.

What we will do in 2018/2019

As part of our on-going commitment to ensuring modern slavery is not present within the Group, we will look to take the following action in 2018/2019:

- Continue to raise awareness amongst all employees of modern slavery issues through training. For example, by rolling training out to more employees and looking to develop a fact sheet to be sent to all employees on identifying and reporting issues.
- Undertake a critical review of our grievance procedure, with particular focus on our internal handling and follow up procedures of issues raised.
- Review our internal due diligence process, in particular to undertake a critical analysis of our Third Party Due Diligence Procedure and ensure that modern slavery and human trafficking are prevalent considerations when assessing whether to engage with any new suppliers.
- Write to those suppliers who have not already been contacted to confirm our expectation of compliance with the Act.

Overall, Stobart Group will continue to focus on understanding further our supply chains, identifying risk areas, and increasing awareness amongst employees on the issues of modern slavery and the reporting procedures available to them. We will continue to update policies

and procedures as required to ensure appropriate safeguards against any mistreatment of persons are in place.



Stobart Group Ltd

August 2018