

# Slavery and human trafficking statement

## Introduction

Our position on human rights within Mitie is clear and covered in our long established ethical business policy and, more explicitly, in our code of conduct. We respect the human rights of all our employees and those within our supply chain and have zero tolerance of slavery and human trafficking.

We are committed to ensuring that slavery, trafficking, bonded labour, forced or servile marriage, descent-based slavery and domestic work and slavery does not take place in our business or any part of our supply chain by:

- Making sure our recruitment processes are transparent and reviewed regularly, with robust processes in place for the vetting of the appointment of our people;
- Raising awareness of the issue amongst our people and suppliers to combat the hidden nature of modern slavery;
- Challenging and supporting our suppliers in the effort to drive out modern slavery and human trafficking; and
- Applying the spirit, as well as the letter of the law, to our internal practices.

## Our structure

Mitie Group PLC is a United Kingdom-based holding company that provides management services with over 63,000 people with a turnover in excess of £2bn. We also operate in the Republic of Ireland, the Isle of Man, Guernsey, and a number of mainland European countries including Norway, Germany, Spain and Belgium, among others.

Our activities focus on the provision of strategic outsourcing services and we operate in four segments: facilities management, property management, healthcare and energy solutions.

## Our business and our supply chains

### Our business

Our facilities management segment provides facilities consultancy, management and service delivery.

Our property management segment offers social housing repairs, maintenance and painting.

Our healthcare segment provides a range of services to people who require help and support due to illness, disability or infirmity.

All our businesses are dependent on their people and supply chains to support the delivery of our services. Each business is responsible to ensure that they can demonstrate they are compliant with the Modern Slavery Act by working to our Group policies and procedures.

### Our supply chain

As a company predominately offering facilities management and specialist support to our clients, our supply chain is characterised by skilled technical contractors and trades.

Occasionally we use temporary labour to support our operational requirement in certain areas (e.g. cleaners, carers and site employees). The materials we buy are in support of the services we deliver and our only goods for resale belong to our Catering business.

## Our governance in relation to slavery and human trafficking

We have a long-established set of policies and procedures covering human rights in general and specially addressing relevant areas to minimise the risk of slavery or human trafficking taking part in our businesses or supply chains.

Our relevant policies and procedures include:

- Our Ethical business practices policy;
- Our Code of Conduct;
- Our People policy – supplemented by our Recruitment procedure;
- Our Procurement policy - supplemented by our Supplier Code of Conduct and our on-boarding procedure; and;
- The Whistle-blowing procedure.

### **Code of Conduct and ethical behaviour**

Our code of conduct forms the cornerstone of our wider ethical business framework. It provides our people with the guidance and support necessary to carry out their work in the right way. We designed our code to help our people understand Mitie's core values and the responsible behaviours which underpin them. It provides guidance and support for every Mitie person when undertaking their work and draws together all of our long-standing policies and procedures from all business areas into one simple and practical guide.

We require not only that our people comply with the code at all times, but that our supply chain partners, joint venture partners and contractors' employees comply with our code too – with a specific supplier's code of conduct provided.

We demand the highest levels of ethical and moral stewardship in Mitie, and are committed to being a responsible business and to develop mutually beneficial and sustainable relationships with our stakeholders, based on trust and co-operation.

### **Our people**

Over and above the requirements of the Modern Slavery Act, we endorse the tenets of the Global Compact principles, International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the Ethical Trading Initiative 'Base Code'. We ensure that employment is chosen freely; freedom of association is respected; working conditions are safe and hygienic; child labour is not used; wages are not lower than minimum wage; working hours are not excessive; no discrimination is practised; regular employment is provided; and no harsh or inhumane treatment is allowed.

We carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, we ensure that all applicants are aware of what checks we will carry out. We only make Job offers subject to satisfactory vetting procedures.

All our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. We employ most of our people directly or on a fixed term basis with checks in place to ensure that payment of salary is direct to that person.

In addition to complying with legislative requirements, we carry out additional background checks on a risk basis, either through our own assessment or one carried out in conjunction with our client.

Our recruitment procedure outlines the mandatory requirements, which includes the requirement to use approved agencies. Our on-boarding procedure ensures that agencies can demonstrate that they comply with all legal requirements, including the requirement to comply with the Modern Slavery Act 2015.

### **Employee awareness and compliance**

Our Employee handbook and Code of Conduct sets out all of our policies and key procedures. We give all our people their own copy of the handbook and a summary version of our Code of Conduct when they begin working for Mitie. We also provide our line managers with a detailed copy of the Code of Conduct.

These core documents, together with our targeted awareness on Modern Slavery and human trafficking helps us to deliver our key messaging so that our people can comply with our requirements.

All these documents are available internally, with our Code of Conduct also published on our external website.

## Supply chain

We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain by ensuring all our suppliers comply with our Supplier Code of Conduct, our on-boarding procedures and all legal requirements.

We expect our suppliers and other business partners to have the same high standards, and we expect our suppliers to continue this ethos throughout their supply chain.

Our Terms and Conditions require that our suppliers comply with all legal requirements, which include adherence to the Modern Slavery Act. Our Supplier code of conduct is published on our external website, and all new suppliers are required to read and acknowledge this as part of our on-boarding process.

## Whistleblowing

We encourage our people, customers and suppliers to report any concerns about unlawful conduct that they suspect is taking place at work. This includes any concerns regarding the risk of slavery or human trafficking. Our simple “Speak Up” procedure makes it easy for our people to report concerns with the knowledge that we do not tolerate harassment, victimisation or reprisals against anyone raising a concern. Our speak up contact details are widely communicated across the business and supply chain and are made available on our website.

## Our due diligence processes in relation to slavery and human trafficking

We enforce our policies and procedures to ensure slavery and human trafficking is not taking place anywhere in our businesses or supply chains.

All our suppliers are subject to our on-boarding process as part of our standard due diligence to assess the suitability of a vendor to provide goods and services to Mitie, against compliance to required standards. This process captures confirmation that they are committed to ensuring slavery and human trafficking is not within their own supply chain.

Our procurement teams carry out audits as part of our supply chain management to provide assurance that our suppliers are responsible partners in our service delivery. This year we have selected sixty tier one suppliers for assessment and will be looking at our tier two suppliers next year.

## Business and supply chain risk assessment and risk management

With the introduction of the Modern Slavery Act, we assessed our supply chain for potential areas of increased risk with non-compliance to the Act. Where areas were identified, we will carry out an audit, which will include a focus on compliance to employment as well as other regulatory and sustainability criteria. The defined criteria for assessing potential areas of risk within our supply chain are:

- a. Companies that operate using temporary low skilled labour;
- b. Operating outside of the UK / EU regulatory frameworks;
- c. Manufacturing or trading in raw materials produced in non UK/EU areas;
- d. Companies that have a strategic partnership with Mitie.

## The effectiveness of our processes

We are using a number of key performance indicators to measure how effective we have been in communicating awareness of our core policies and procedure related to the requirements of the Modern Slavery Act, and our other actions to ensure that slavery and human trafficking is not taking part in any of our businesses or supply chains. The KPI's will be subject to ongoing review by the Board to ensure their continued effectiveness.

## Training on slavery and human trafficking

We have created awareness guidance for our suppliers, and training for our own people, so they understand the issues involved, become more aware of the risks, the signs to be vigilant of and how to raise awareness (including the use of the “speak up” service) should they see something suspicious.

We consider that improved awareness is one of our most effective methods to reduce the risk of modern slavery and with the help of both our employees and suppliers we can ensure that there are no opportunities to hide forced labour within our organisation and that of our supply chain.

To spread the awareness message, we are creating articles and information briefings for all our personnel to compliment the guidance provided to suppliers. We are taking a targeted approach to more detailed training on slavery and human trafficking. This will cover our people involved in our procurement processes and the hiring of staff, especially where this involves in the promotion and monitoring of our agency workers.

We believe in promoting our culture of excellence, and have briefed all our business board members on the subject.

Our Mitie guidance document on Modern Slavery – an introduction and response is available to all our people as we capture this in our Mitie Business Management System. We actively promote the message through our substantial and varied communications channels.

We use our key performance indicators to monitor the level of engagement for the Group.

## Our commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Mitie’s slavery and human trafficking statement as agreed by the senior management.



Phil Bentley

**Chief Executive**  
**Mitie Group PLC**

28 September 2016