



# Code of Conduct

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# OUR PARTNERSHIP WITH ROYAL LONDON

## CREATING GREAT SPACES TO WORK



### As a valued member of our team, you are an ambassador for Mitie.

You will be working in partnership with one of our most prestigious clients, Royal London. Within your role you are representing Mitie, and as part of this team we embody our customer's ethos and support their quest to create Great Spaces to Work.

This Code of Conduct has been designed to help you understand our relationship with our Royal London colleagues and give you insight into Your Workspace brand, which supports and connects the Four Pillars of their strategy and culture. We as part of their team, adopt certain values that will enable all of us to deliver first class facilities services whilst creating Exceptional Customer experiences.

When Mitie was selected as FM provider, Royal London chose to redefine their working platform and rebrand to a "Workplace" team which presents a clear purpose of creating great spaces to work. The new brand covers four main pillars - Estates, Environment, Facilities Services and Health, Safety & Wellbeing - each having their own area of responsibility as well as overlapping and supporting each other. The aim is to ensure that with the transformation of service, comes a transformed brand, improved communications and customer experience.

The resulting Your Workspace team is focused on embodying Royal London's ability to transform, communicate and encourage a holistic working approach. The new identity reflects Royal London's determination to connect our teams and says, "we treat our colleagues like our customers".



### We are empowered

We provide people with the tools and authority to act and make decisions. So that everyone here has a voice to improve the way things are done.



### We are trustworthy

We're approachable and transparent in the way we interact. We build relationships that are built on trust and respect, delivering mutual benefit.



### We collaborate

We share our knowledge, developing our expertise and learning from mistakes. We inspire each other to give our best and enjoy our work.



### We achieve

We go the extra mile to deliver the best outcomes. We're always looking to do things better and continuously improve our performance.



## GETTING TO KNOW ROYAL LONDON: A PROUD HISTORY

For more than 150 years, people have been at the heart of all that is great about Royal London.

Helping people to help themselves. This has always been at Royal London's core. They started life as a society with good intentions, founded to help even the poorest families gain a sense of security, and evolved into a mutual insurer in 1908. During the war years, female employees joined their ranks and played an integral role in helping Royal London adapt, and in the years that followed, they merged, acquired and expanded their business, staying true to themselves. Today, the products, services and benefits that people need may have evolved, but their ability to work together and deliver for their customers will forever remain.

Over the years, Royal London has expanded to become the UK's largest mutual life, pensions and investment company – and one of the UK's top-rated places to work. Today, they have 3,000 employees working in six offices across the UK and Ireland. They have worked hard to become experts in specialist markets, building the most trusted name – receiving numerous awards along the way.

Royal London is still a member-owned business meaning there are no shareholders. Many customers are members and the people who join the Royal London team are usually both members and employees. So, as well as offering the best outcomes and experiences for customers, they also look after their people.



# OUR PEOPLE

## DOING THE RIGHT THING

**A responsible company is one that will succeed and continue to grow, and that is why our code of conduct is a central part of our wider ethical business framework. It provides you with the guidance and support necessary to carry out your work in the right way.**

**Our code** provides guidance and support for every person when undertaking their work at Royal London and draws together all our longstanding policies and procedures from across the business into one simple and practical guide. Failure to comply with these puts the company and you at risk.

Everyone at Mitie should be aware that the consequences for not working to the requirements of this code may be very serious. We need you to read this code and fully understand your role in working responsibly within your business. If you are ever worried that the requirements of this code are not being followed, or you are being put under pressure to do something you feel is wrong, then we want to hear about it.

Mitie's success relies upon having a strong reputation for doing the right thing – we need

you to follow this code every day. But it is only the starting point and we cannot provide the answer for every scenario you may encounter. Use good judgement and if you are ever unsure, then just ask. We will lead by example in applying this code in all that we do. We ask you to do the same and help Mitie continue to grow as a responsible business by always doing the right thing.

### **Our code – what is it?**

Do the right thing Our code has been designed to help you understand our core values and the responsible behaviour expected to support these values, safeguarding Mitie's reputation and ensuring the future sustainable growth of the business.

It provides guidance and support for every Mitie person when undertaking their work. It draws together all of our longstanding policies and procedures from across the business into one simple to follow guide.

The code does not provide the answer to every question you may have or every situation you may be faced with; instead it provides a set of guiding principles to follow when faced with an ethical dilemma. These principles act as a signpost to help you do the right thing. Where reference to company policy or legislation is provided, the requirements must be complied with at all times. Failure to do so may have disciplinary consequences.

## Who does the code apply to?

Every person who works for Mitie needs to follow the requirements of the code and follow the expected standards of behaviour. The code requirements apply to all sectors and all countries in which Mitie operates without exception. Our supply chain partners, joint venture partners and contractors' employees also need to ensure they follow the principles established in this code.

The consequences of not following the code can be serious, and may include harm to our reputation, criminal liability, loss of contracts and, on a personal level, disciplinary action – including dismissal.



## Zero tolerance

While this code provides several principles to help you make the right decision when at work, there are specific areas where we take a clear and unambiguous stance. This includes a zero-tolerance position for any of the areas below:

- Condoning unsafe working practices
- Discrimination on any grounds, including race, religion, disability, gender, age or sexual orientation grounds
- Violence and aggression
- Bullying and harassment
- Bribery and corruption
- Tax evasion and the facilitation of tax evasion; and
- Retaliation against those who speak up and do the right thing.

You have a responsibility to speak up when you see behaviour or matters that sit outside of the requirements of this code and the policies and procedures it supports.

If you are aware of any issues relating to the areas above, we need to know about it. Please make your concerns known to a colleague, your manager or a local HR manager. If you feel uncomfortable about doing this, please use our independent Whistleblowing service Report your concerns by:

**Telephone:** 0800 374 199

**Web:** [wrs.expolink.co.uk/mitie](https://wrs.expolink.co.uk/mitie)

**Download the SpeakingUp app** from Apple, Google Play, Microsoft app stores, **access code: mitie.**

## Speak up

Our Whistleblowing service is there to help you speak up. We understand that, from time to time, difficult situations may occur where you may be asked to do something or be involved in something illegal or unethical.

Equally, you may be treated unfairly or see colleagues treated unfairly. This code gives you the guidance to help understand the context behind these situations so you can do the right thing.

Questions to help you understand what the right thing is, include:

- Is it in line with Mitie policy?
- Is it legal? Is it ethical?
- Would I be happy telling a member of my family or closest friend what I was doing or been asked to do?
- Can I look myself in the mirror?
- Would I like to be treated that way?
- What is your heart telling you?
- Have I received the right training to be able to do my job in the right way?

If you encounter a problem with a colleague, you should initially discuss the matter with them. If this is not possible, you should speak to your line manager or local HR manager. If it is not possible to talk to any of the above, please call our independent Whistleblowing service.

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## Responsible operations – Health and safety

**We want all our people to work safely and return home safely at the end of each and every day.**

We call this Work Safe Home Safe! We expect all our people to play their part in making our operations safer and ensuring their team has the right equipment, training and knowledge to guarantee a safe working environment. As Mitie employees:

### We must always:

- Be aware of the work we're undertaking and the hazards associated with it;
- Follow the safe working procedure provided for us;
- Look out for your own safety and others around us;
- Report any accident, near miss, injury, ill health or unsafe condition so that action can be taken;
- Ensure we are properly trained for the work you are doing.

### We must never:

- Condone any unsafe act, condition or behaviour;
- Walk by an unsafe act or work area without raising the issue;
- Ignore the training we have been provided with;
- Apply pressure to our work colleagues to work unsafely; or
- Work while under the influence of alcohol or drugs.

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## Responsible operations – Sustainability

**Our sustainability approach has six target areas and we need your input and support to help deliver these.**

You can help make Mitie a more sustainable business by understanding your role in delivering our sustainability objectives and by seeking new ways to provide our services. As Mitie employees:

### We must always:

- Comply with the requirements of the health, safety and policy (MG(Pol)001) and the sustainability and energy policy (MG(Pol)003);
- Be aware of the environmental impacts associated with our business and work to minimise these;
- Ensure all environmental incidents or near misses are promptly reported so that action can be taken;
- Be aware of opportunities to provide our services in a more sustainable way; and
- Ensure our supply chain partners are aware of Mitie's sustainability objectives and are working to support these.

### We must never:

- Condone any act, condition or behaviour that is likely to result in an environmental incident;
- Ignore the training we have been provided with; or
- Fail to report an environmental incident or near miss.

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## Employee relations – Diversity and equality

### Mitie employs thousands of people, but ultimately we are one team.

We trust one another and we value everyone's contribution. Our commitment to a fair and responsible workplace, free of discrimination, inequality or harassment is unwavering and we expect these standards to apply when working with our clients and with our supply chain partners. As Mitie employees:

#### We must always:

- Show the highest standards of professional conduct at all times;
- Treat everyone with dignity and respect;
- Expect the same treatment from others in return;
- Communicate and exhibit Mitie's values and related behaviours at all times; and
- Report any incident or potential incident that we become aware of.

#### We must never:

- Work in such a way that our colleagues feel abused, intimidated or mistreated;
- Condone any form of harassment or abuse from our team;
- Be involved in an inappropriate personal relationship with a colleague which may cause decision making to be compromised;
- Use someone's personal situation or personal information to exploit them; or
- Fail to report an incident relating to harassment, intimidation or mistreatment.







# OUR BUSINESS



## Gifts and hospitality

### *Doing the right thing:*

The provision of gifts and hospitality is acceptable but should not be done in an attempt to secure preferential treatment. In some cases, it may lead to a conflict of interest and inhibit objective decision-making. If you are offered any form of gift or hospitality and it just feels wrong to accept it, then it's probably not a reasonable gift. You must report this to your line manager.

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## Responsible partnerships with our suppliers

### *Doing the right thing:*

The development of a responsible supply chain is critical to the success of our business now and in the future. We must ensure our partners share our responsible values and that we, in turn, treat them with trust and transparency. At Mitie we, evaluate, select and performance manage suppliers openly using clear and objective criteria.

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## Facilitation of tax evasion

### *Doing the right thing:*

We operate a zero tolerance to tax evasion and the facilitation of tax evasion by our employees, contractors and those who provide services for or on Mite's behalf. We expect you to comply with all legislation regarding the facilitation of tax evasion as a Mitie employee and to take all reasonable steps to ensure our supply chain partners operate in the same way.

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## Competition

### *Doing the right thing:*

Whenever and wherever we operate, we must comply with fair competition legislation. We must never enter into any price-fixing arrangements, share sensitive price information, attempt to rig bids or undertake restrictive practices with our competitors or supply chain partners, either directly or indirectly. Undertaking any of these practices will lead to disciplinary action. If you are in any doubt in this regard in relation to a business proposal, you should seek guidance from your Divisional Lawyer.

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## Conflicts of interest

### *Doing the right thing:*

At Mitie, all decisions must be made with the best interests of the company in mind. You must never allow external influences, particularly friends, family or any financial or political interest, to affect your decision. Situations like these should be avoided but, where they do happen, they need to be transparent and very carefully managed.

## Bribery and corruption

### *Doing the right thing:*

We operate a zero-tolerance policy towards bribery and corruption. We expect you to comply with all legislation regarding bribery and corruption and to take all reasonable steps to ensure our supply chain partners operate in the same way.



# OUR INTEGRITY

## Data protection / confidential information

### *Doing the right thing:*

Mitie handles personal and confidential information relating to our people and our clients on a daily basis, and we are committed to ensuring this information remains secure at all times. Failure to keep this information secure may result in prosecution, significant fines and reputational damage.

## Communicating with the outside world

### *Doing the right thing:*

Our communication with external stakeholders (the media, shareholders, suppliers, the communities we work in) must be clear and truthful. All external communication must be approved by our corporate affairs team. Internal communication is equally important, as it can quickly become external communication, so please take care when using social media or composing emails.

## Financial and non-financial accounting and reporting

### *Doing the right thing:*

We must ensure we report openly and honestly on our business performance. Falsifying or intentionally mis-stating any records, be they expenses, timesheets, operational compliance key performance indicators, supplier invoices or company accounts or any other documentation is fraudulent and could have a significant impact on Mitie's reputation and may result in incorrect business decisions being made.

## Protecting our assets

### *Doing the right thing:*

We must make sure we look after and respect all Mitie's assets, namely our place of work, our computer and telephone, the vehicle we may use to get to and from work, finances or supplies that you may have access to, and even the time that we have to do our job. All these assets must be used responsibly, safely and for business purposes.

## Information management and security

### *Doing the right thing:*

Information is one of our most valuable assets and we must do all that we can to protect it. Secure information helps to ensure business continuity and reduce disruption by preventing or minimising the impact of security breaches. It also demonstrates to clients that we handle their information with care, giving them added confidence in our integrity.

## Political relationships

### *Doing the right thing:*

When it comes to political activity, our stance is clear: while Mitie regularly engages with government, regulators and the public sector, no Mitie employee should involve themselves in political activity or make a donation to a political party and must remain politically-neutral at all times. We do, however, recognise the right for individuals to be involved in political activities, but when this happens we must make it clear that the views expressed are our own.





YOUR  
WORKPLACE