

## SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

### REPORTING ENTITY & LEGISLATIVE COMPLIANCE

This document constitutes Mitie Group Plc's Modern Slavery and Human Trafficking (MSHT) statement for the financial year 2024, as approved by the Board.

This statement meets the requirements of the reporting criteria of section 54 of The Modern Slavery Act 2015 (the Act). This statement relates to Mitie Group Plc, covering all business regions, operating companies and business units throughout the world, including wholly owned subsidiaries and majority owned operations. A list of subsidiaries and subsidiary undertakings is set out in Appendix A.

For the purposes of this statement, Mitie Group Plc, its subsidiaries and subsidiary undertakings are collectively referred to as Mitie.

### SCOPE OF THIS REPORT

Our mission, alongside our customers and shareholders, is to tackle risks of Modern Slavery and Human Trafficking in all our operations. This includes our cleaning and hygiene, projects, security, technical services, supply chain and employer activities. By doing so, we ensure we deliver 'The Exceptional, Every Day'.

This report is divided into the following sections:

1. Executive summary
2. Organisation structure and supply chains
3. Policies in relation to slavery and human trafficking
4. Due diligence processes
5. Risk assessment and management
6. Stakeholder engagement
7. Key performance indicators
8. Next steps

Mitie works with around 8,000 suppliers, mainly in building works, security, and mechanical & electrical services. In FY24, no incidents of modern slavery were identified in our organisation or our supply chain.

Modern slavery, which includes forced labour, human trafficking, and forced marriage, is still a significant issue today. Despite ongoing efforts to fight it, various factors make it difficult to detect and eliminate. These risks can affect different parts of our business, including our clients, suppliers, customers, and employment practices.

In 2023, we took clear steps to combat modern slavery. We focused on identifying, assessing, and addressing the risks within our operations and supply chain. Moving forward, we are committed to strengthening these efforts to ensure a safe and ethical environment for our colleagues and those engaged through our supply chain.

### Milestones and Performance

Key milestones and performance indicators from FY24 include:

- Completion of high-risk supplier modern slavery due diligence
- 87% score in the UK Cabinet Office Modern Slavery Assessment (MSAT)

- 79% score in the UK Cabinet Office Labour Standards Assessment (LSAT)
- Employee engagement of 63%
- Recognition as a Top 50 UK Employer and an Inclusive Top 50 Employer 2023

## Achievements

Key achievements in FY24 include:

- Upgrading of our screening platform for third parties to include more robust human rights and MSHT checks
- Focus on communications, training, and discussions across divisions on human rights and MSHT
- Collaboration with the Cabinet Office and other strategic service providers to the government
- Maintained a Gold partnership with the Supply Chain Sustainability School and its partnership network as part of the Modern Slavery Working Group
- Supported the development and publication of the Supply Chain Sustainability School's guide on addressing modern slavery and labour exploitation in the built environment

## What Next?

Building on the progress made in FY24, key actions for FY25 will include:

- Strengthening our partnership with Stronger Together
- Continuing to follow up on selected high-risk suppliers to understand their management of MSHT in their supply chain
- Reviewing how human rights and MSHT due diligence is monitored for suppliers not classified as high risk
- Reviewing how we retrospectively assess and support our SMEs and VCSEs due diligence
- Continuing to hold monthly meeting of our Modern Slavery Task Force which monitors activities, best practices, and compliance across the organisation
- Reviewing how our Ethics Champions can raise awareness on human rights and our MSHT programme
- Continuing to refresh and deliver training on modern slavery to key groups, including higher-risk contracts and procurement teams

## 2. ORGANISATION STRUCTURE AND SUPPLY CHAINS

Our position on human rights within Mitie is clear and covered in our long-established Ethical Business Practices 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 seeking to:

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

This Statement sets out the steps which Mitie has taken during the financial year ending 31 March 2024 to help ensure that slavery and human trafficking is not taking place in any part of our business or supply chain. Our revenue for this year was £4,511m and we have been issuing a Modern Slavery

Statement since 2017. Copies of Modern Slavery Statements from previous years are available on our website [www.mitie.com](http://www.mitie.com).

## Our Business

We are the UK's leading technology-led Facilities transformation company. A trusted partner to over 3,000 blue-chip customers across the public and private sectors, working with them to transform their built estates and the lived experiences for their people, and providing data-driven insights to inform decision-making.

In each of our core service lines of Engineering, Security and Cleaning & Hygiene we hold market leadership positions. We upsell Projects capabilities in the higher growth categories of Buildings Infrastructure, Decarbonisation, Fire & Security and Telecoms Infrastructure. We employ 64,000 people across the country, looking after a large, diverse, blue-hip customer base, from banks and retailers, to hospitals, schools and government offices.

We take care of our customers' people and buildings, through the 'Science of Service', and we are transforming facilities to be more flexible, safe, sustainable, and attractive to all. We operate in the UK, the Republic of Ireland, the Isle of Man, Guernsey, certain mainland European countries including Spain and also support overseas operations for government clients.

All our businesses are dependent on our people and our supply chain to support the delivery of our services. Each business is responsible for ensuring that they can demonstrate compliance with the Act by working to our Group policies and procedures. Further information on our business can be found at: <https://www.mitie.com>

## Chief Executive Officer Statement

*"At Mitie, we believe that working here is more than just a job. Each member of our team, proudly wearing our logo, contributes to something far greater. Together, we make a positive impact on millions of lives, every single day. Our five core values reflect our unwavering commitment to excellence in our work, for our clients, our employees, and everyone within our supply chain."*

*Our dedicated colleagues and Mitie Values are the cornerstone of our identity, driving our daily commitment to human rights. We are resolute in our efforts to eliminate any form of human trafficking, forced, bonded, compulsory, illegal, or child labour. We refuse to be complicit with, or knowingly collaborate with, anyone who engages in such practices. Mitie is continuously enhancing our processes to better report, monitor, and manage our human rights and modern slavery impacts. We champion the highest standards and proactive measures throughout our partnerships and supply chain."*

## Our 2024 Statement

As the UK's leading facilities transformation and professional services company, we have a unique opportunity to influence and reduce modern slavery risks in our operations. We are committed to using our industry position to support efforts against modern slavery.

Global socioeconomic challenges, uncertainty, and climate change have increased the risk of exploitation and modern slavery. This issue is growing, both in the UK and worldwide, as highlighted by Unseen UK, which operates the Modern Slavery and Exploitation Helpline. They reported the highest number of potential victims in a single quarter in 2023, with 1,581 potential victims identified in the first three months.

In 2023, Mitie embarked on a journey of continuous improvement, significantly enhancing our understanding and prioritizing key actions to combat modern slavery and human trafficking. We have worked diligently with key stakeholders to better understand and mitigate these risks across our operations and supply chain. We made significant progress since 2023 and will continue this

momentum going forward, as we review, improve, and embed our approach to addressing modern slavery and human trafficking.

## Our Commitment

At Mitie, our aim is simple: we work to deliver the exceptional, every day. We're proud to employ 64,000 people across the country, and are committed to providing a rewarding, fair and sustainable working environment for our people. This commitment doesn't just apply to Mitie's direct employees, it applies to agency workers and contractors, in all countries in which we operate.

Our promise to our people is to create a workplace where you can thrive and be your best every day. We have zero tolerance for modern slavery, human trafficking, or forced labour in any part of our business or supply chain. We embed human rights into our operations, showing our commitment to respecting and protecting the dignity and rights of our colleagues and everyone we interact with, including those in our care, our service users, and those working for our business partners or suppliers.

At Mitie, we know that to attract and retain exceptional colleagues, we must be a 'Great Place to Work'. This is our top priority because Mitie is nothing without its people who uphold our culture. We strive to create an equal, inclusive, and diverse work environment where everyone can be their true selves, feel valued for their work and contributions, and where our commitment to human rights is a fundamental foundation.

To support us on this journey, we have aligned our values with our purpose. These values guide how we work together, behave, and make decisions.

## Our Vision and Values

Our values champion the culture of diversity, integrity and trust in everything we do. Our shared vision and values are a set of guiding principles and fundamental beliefs that help us work together as a team and underpin how we behave. These are at the heart of our agenda, striving to promote inclusivity, dignity, fairness, equality and respect in our buildings and our clients, every day.

- **We are one Mitie**  
We work as one to deliver a seamless, unrivalled service. We are all in it together if we can help a customer or colleague in any way, we will. We are one Mitie.
- **We are built on integrity and trust**  
Integrity and trust are at the heart of all we do. We are the face of the company. We treat others as we would like to be treated. We are proud to work for Mitie.
- **We go the extra mile**  
Whether its keeping things running smoothly in a safe environment, looking for new ways to do things better or fixing problems, going the extra mile for our colleagues and customers and keeping our promises is in our DNA.
- **Our diversity makes us stronger**  
We are very proud of our rich and diverse culture and backgrounds. Our diversity creates ideas and insights. Everyone at Mitie has a voice and is treated as an equal.
- **Our customers' business, is our business**  
We are a partner, trusted for our expertise. We put our customers at the heart of everything we do.

## Governance In Relation to Slavery and Human Trafficking

To stay and manage risks effectively, we have a strong internal governance structure. This keeps us focused and ensures we address human rights and social issues with clear oversight, accountability and responsibility.

Mitie’s approach to human rights is governed by our People Policy and its implementation through the business is driven through the People Function. This is led by our Chief People Officer, who together with the Chief Legal Officer is responsible for our ethics compliance strategy and associated policy and governance, including human rights and MSHT.

### Board Oversight

Overall responsibility for Mitie’s compliance with human rights legislation and guidance resides with the Board, which is responsible for the strategic direction of the business, setting targets and the prioritisation of material matters relating to the Group. The responsibilities of the Chief Executive (CEO) include the successful implementation of the Group’s strategy, including actions in relation to human rights and modern slavery and human trafficking.

The CEO is assisted by members of senior management in relation to human rights and modern slavery related matters as follows:

- **Chief Legal Officer:** Provides legal oversight and ensures the company adheres to all relevant laws and regulations regarding modern slavery.
- **Chief People Officer:** Manages policies and practices related to employee rights, training, and awareness programs on modern slavery.
- **Chief Procurement Officer:** Ensures responsible sourcing and supply chain management to prevent modern slavery in the supply chain.
- **Group Director for Sustainability & Social Value:** Integrates modern slavery prevention into the company’s sustainability and corporate social responsibility initiatives.

In addition to the above, several committees exist across the Group and play an important part in the management of Mitie’s approach to modern slavery and human trafficking. The Committees’ roles are to oversee the company policies, performance and priorities as responsible business and to manage Mitie’s activities of all stakeholders including customers, shareholder, colleagues, suppliers, and the wider community.



## Modern Slavery & Human Trafficking in our ESG Framework

In 2024, we worked with both internal and external stakeholders to identify key priorities from a wide range of ESG topics, using various international standards. In 2025, we plan to enhance this feedback with global data from peers, competitors, regulators, policymakers, and public opinion. We have conducted ‘double materiality’ analysis to objectively examine risks and opportunities across our ESG landscape.

Our Social Value Framework aligns with the Government’s Social Value Model and the UN Sustainable Development Goals. It focuses on reducing workforce inequality and eliminating violence, exploitation, forced labour, modern slavery, human trafficking, and child labour. This framework supports our commitment to sustainability and social value across our operations. Each of the five pillars has specific objectives and targets, and we publish our progress against these goals monthly on our website.



### 3. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Mitie is clear on what is acceptable and what isn’t. We will not use any form of forced, compulsory, trafficked or child labour. We ensure that all Mitie employees work for the company on a voluntary basis, and not under threat of any penalty or sanctions. We will not employ anyone younger than the legal minimum age for employment.

We have well-established policies and procedures that ensure we operate responsibly and ethically and that we respect and protect human rights. These policies are accessible on various Mitie platforms and our Integrated Management System (IMS), which combines all our systems, processes, and standards into one smart system.

#### **Recruitment**

Our recruitment policies and procedures are fair and transparent, ensuring all colleagues have employment documentation in a language they understand. We ensure that any accommodation provided to colleagues meets both local and international standards. We do not engage in, or support forced labour, human trafficking, or any form of involuntary servitude. We respect the rights of children and young workers, protecting them from work that could harm their development.

#### **People**

Our [People policy](#) recognises that to attract and keep exceptional colleagues we must make Mitie a ‘Great Place to Work’. It supports Mitie’s commitment to providing a rewarding, fair and sustainable working environment for its people.

#### **ED&I**

Our [Equality, Diversity and Inclusion Policy](#) sets the base for what our employees deserve and what we must do to uphold our culture, ensuring every employee is treated with respect and dignity. It supports our zero-tolerance approach to discrimination, harassment, violence, and aggressive behaviour.

### **Ethics**

Our [Employee Handbook](#) and [Ethical Business Practices Policy](#) ensure that we conduct our operations with honesty, integrity and openness, supporting our approach to governance and corporate responsibility.

### **Wellbeing**

Our wellbeing benefits and initiatives cover financial, physical, and mental health, ensuring complete support for all our colleagues. Further information available in our [Health and Safety Policy](#).

### **Supply Chain**

These standards don't just apply internally, we expect our suppliers to follow them. In conjunction with our [Procurement Policy](#), our [Supplier Social Value Policy](#) and [our Guidance for Mitie Suppliers on Modern Slavery and Human Trafficking](#) covers these expectations, and suppliers have to agree to abide by these policies. Mitie's Supplier Management Framework (SMF) covers key suppliers who are closely monitored and scored against a range of metrics, some of these are social value, sustainability, and ethical procurement, which involves ensuring human rights and related areas are up to Mitie standards.

### **Whistleblowing Procedure**

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.

All colleagues must follow Mitie's key ethics and compliance policies, such as the Employee Handbook, Ethical Business Practice Policy, People Policy, and Equality, Diversity & Inclusion Policy. If anyone notices behaviour that doesn't align with these policies, they can report it through various channels, including Mitie's independent whistleblowing service "Speak Up," discussions with line managers, People Support, or directly with the Chief Executive via email to 'Grill Phil.'

Mitie's "Speak Up" service allows employees, customers, suppliers, and third parties to report concerns anonymously and without fear of retaliation. The platform is managed by an independent third party, Navex Global, and can be accessed via a telephone hotline and a web portal. Details are made available in multiple languages through workplace posters, the Employee Handbook, Mitie's Intranet, and MitiePeople.com. Customers, suppliers, and the public can also access it via [www.mitie.com](http://www.mitie.com). Reports are reviewed and investigated independently to avoid conflicts of interest, and a central Whistleblowing Investigation Group, including the Deputy General Counsel and Senior Internal Audit members, oversees all reports.

This process ensures transparency and helps identify and address trends. Updates on whistleblowing activity are provided at every Board meeting and to senior executives (MGX) as needed, detailing incident reports, ongoing cases, and outcomes of investigations. The Speak Up platform allows Mitie to track investigations by business division and status, helping the Board monitor and address trends across the organization.

All reports are investigated confidentially. After an investigation, we take necessary actions to address any substantiated issues or weaknesses in controls. Each action is assigned to a specific owner and has a set timeframe to ensure accountability.

We aim to foster a supportive and open environment where anyone can easily raise concerns about risks or issues related to Mitie operations. These can be discussed directly with line managers and local Human Resource and Ethics Compliance teams, with the help of formal channels. We take proactive steps to detect unethical activities. These efforts help us respond quickly if any unethical behaviour is found and provide extra reassurance if none is detected. Anyone encountering, or affected by modern slavery, can reach out to the Modern Slavery Helpline or other specialist support providers in the UK for advice on remedy, compensation, and justice.

## Quality, Health, Safety and Environment (QHSE)

Mitie understands that health, safety, and wellbeing are essential for ensuring our colleagues return home healthy and safe each day. Our Quality, Health, Safety, and Environment (QHSE) department is key in tackling modern slavery within our organization. They make sure our human rights and modern slavery policies are followed throughout the business. This includes providing training and awareness programs to employees, workers, and subcontractors to help them recognize and address the risks of modern slavery and human trafficking. QHSE also performs regular risk assessments to identify potential vulnerabilities and takes proactive measures. They audit sites within our contracts to ensure compliance with ethical standards and to prevent any involvement in modern slavery practices.

## Workforce Engagement

It's crucial for board members to listen to the workforce regarding modern slavery because employees are often the first to notice signs, allowing early detection and prevention of further harm. Insights from the workforce help Board members make informed decisions about policies and practices, building trust and encouraging transparency. Engaging with employees ensures compliance with legal requirements, protects Mitie's reputation, and empowers employees, increasing their engagement and support for anti-slavery initiatives.

By actively listening, board members can create a safer, more ethical, and responsive organization. Jennifer Duvalier is Mitie's designated Non-Executive Director responsible for oversight of the Board's engagement with Mitie colleagues. Jennifer participates directly in employee engagement initiatives and, along with other Board members, has carried out a full programme of activities in FY24. One of Jennifer's main roles is to encourage colleagues to share their views so that she can champion their voice in Board discussions. Details of the activities undertaken by Jennifer and other Non-Executive Directors during the year can be found on page 100 on Mitie's 2024 Annual Report.

During FY24, Mitie held a number of colleague listening sessions, with Jennifer and other Board members hosting at least one listening session with Mitie colleagues or attending a Mitie diversity network event each month. The wider Board will continue to support Jennifer by attending listening sessions and diversity network events during FY25. The Board's role in colleague engagement is supported by Mitie's Chief People Officer and the Head of Communications. In collaboration with Mitie's divisional leads, the Chief People Officer and the Head of Communications evaluate Mitie's annual employee engagement survey data and undertake a range of site visits that ensure effective reach to Mitie colleagues in all jurisdictions in which we operate.

Topics of discussion are determined by the relevant site teams ensuring that Board members hear about topics that matter to the front-line including colleagues' experiences of working at Mitie, challenges, concerns, ideas for improvement, and the things that employees consider Mitie does well.

Feedback from site visits is shared with the wider Board and discussed Board meetings. Details of the Board's engagement with colleagues are also shared through Mitie's internal communication channels – MiNet (employee intranet site) and mitiepeople.com. The Board considers it important that colleagues' views are heard through several mediums, and therefore in addition to site visits and the annual employee engagement survey the Board encourages feedback through other channels including via managers, surveys, internal communications and digital channels (such as Yammer). All of these initiatives help to develop an inclusive, two-way and 'One Mitie' culture.

Through hosting colleague listening sessions, Jennifer and the wider Board meet colleagues across the business and listen to their views and experiences to understand first-hand what they value about Mitie and what they would like to be different. The Board is also able to instil confidence that colleagues' views are being heard at the highest level of the organisation. In analysing the feedback



received, the Board can quickly identify any recurring concerns across the business and provide assurance that these will be managed effectively and efficiently. Learnings and responses. Themes identified from the Board's colleague listening sessions can be found in Mitie's Annual Report page 105.

#### 4. DUE DILIGENCE PROCESSES

We are dedicated to ensuring that slavery and human trafficking have no place in our business or supply chain. Our supplier on-boarding process includes standard due diligence procedures, which help us assess the suitability of a supplier to provide goods and services to Mitie against compliance to required standards. This process captures confirmation that they are committed to ensuring that slavery and human trafficking is not taking place within their own supply chain. Tender and supplier selection processes also include checks for acceptance of Mitie terms and conditions, the Supplier Social Value Policy and Guidance for Mitie Suppliers on Modern Slavery and Human Trafficking. These documents are accessible on our Mitiesuppliers.com portal.

Additionally, part of the tendering and Alcumus Safecontractor checks (for onsite suppliers) involves reviewing their modern slavery statements and assessing risks related to modern slavery and human rights. Suppliers cannot receive a purchase order from our digital supplier platform (DSP) until all onboarding checks are completed. We continuously monitor suppliers' ongoing health and risk through external data feeds, which include financial health, compliance, screening lists, and news sentiment.

Our procurement team also conducts desktop audits as part of our supply chain management to ensure our suppliers are responsible partners. We regularly analyse our supply chain for potential risks, taking into account changes affecting our business, suppliers, and the sectors in which we operate. Modern Slavery is a key topic at Supplier Management Framework review meetings with our Tier One suppliers. This helps us identify, understand, and mitigate modern slavery risks. Over the next 12 months, we will extend this review process to Tier Two and Tier Three suppliers.

As part of our compliance processes, we assess our supply chain for areas of increased risk of non-compliance with the Act. When we identify such areas, we conduct audits focusing on compliance with employment and other regulatory and sustainability criteria. We assess potential risk areas based on:

- Companies using temporary low-skilled labour
- Operations outside the UK/EU regulatory frameworks
- Manufacturing or trading in raw materials from non-UK/EU areas
- Companies that have a strategic partnership with Mitie

If any weaknesses in processes or governance are identified, we will seek to agree a detailed plan of action with a supplier to remedy the deficiencies. Failure by a supplier to agree to adhere to legal requirements, to respond to an audit questionnaire or to provide assurances that it has satisfactorily assessed risks of modern slavery, may lead us to review our business relationship.

#### 5. RISK ASSESSMENT AND MANAGEMENT

We provide a wide range of services in sectors which may be considered higher risk from a modern slavery perspective, including hospitality, security, cleaning, catering, and project work. These services are either delivered directly by Mitie colleagues or in conjunction with our supply chain partners. Our connections to electronics manufacturing, solar panel technology, garment production, and our clients in healthcare and social care also pose potential risks for modern slavery and social vulnerability. This is due to the nature of the workforce, which can often involve low-skilled labour, a high number of temporary or agency workers, and demanding jobs.

Mitie is in a unique position to help other businesses address these risks. Our commitment to doing the right thing goes beyond being a responsible employer. We aim to integrate our dedication to combating modern slavery and human trafficking (MSHT) into our operations to protect individuals from any human rights violations.

As a service provider, we understand our crucial role in tackling modern slavery and human trafficking. We are committed to mitigating these risks which can be distilled into the following three main areas:

- **Our People:** Including our operations, employment practices, internal policies, and recruitment through agencies and third parties.
- **Our Suppliers:** Incorporating our supply chain in the UK and overseas.
- **Other Venerable Groups:** Including (but not limited) to those affected by socio-economic factors, unstable social and political conditions.

The Board, along with our Legal, People Team, Procurement, and Regulatory Teams, oversee the formal process for identifying, evaluating, and managing significant risks. These teams provide a risk management framework, including reporting on significant risks, Mitie policies, and standard operating procedures. For more information, please refer to the Structure and Governance section.

## Our People

Mitie is one of the UK's largest employers, with 64,000 colleagues across the country. Our team plays a vital role in our success and that of our customers, contributing significantly to the UK economy and keeping the country running smoothly. We believe our people perform best when they know we care, so we prioritise their safety and wellbeing. We're proud to be a company that listens, takes action, and celebrates diversity, striving to be a 'Great Place to Work' for everyone.

Our vision is to be the top employer in our industry, leading in how we treat our colleagues and supporting the communities we serve. We set ambitious goals to ensure diversity, fair wages, market-leading benefits, and learning opportunities through our apprenticeship program.

Beyond the Act, we endorse the United Nations Global Compact Principles, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work, and the Ethical Trading Initiative 'Base Code.' Our human rights policies are guided by international principles, including the International Bill of Human Rights, Transparency International, the Responsible Business Alliance Code of Conduct, the UN Global Coalition Against Corruption, the International Labour Organisation's Declaration on fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

We ensure employment is freely chosen, respect freedom of association, maintain safe and hygienic working conditions, prohibit child labour, pay at least the minimum wage, avoid excessive working hours, practice non-discrimination, provide regular employment, and prohibit harsh or inhumane treatment.

## Employee Handbook

Our Employee Handbook (which incorporates 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 Handbook to help our people understand Mitie's core values and the responsible behaviours which underpin them. It provides guidance and support for all Mitie personnel when undertaking their work and draws together all our longstanding policies and procedures from all business areas into one simple and practical guide. A copy of the Handbook is available at [www.mitiepeople.com](http://www.mitiepeople.com).

## Colleague Screening Standards

Prior to employment of a new candidate, we carry out appropriate checks to ensure that any new applicant, permanent and non-permanent, including temporary and contractors is suitable for the role that they have applied for. Prior to making an offer, we ensure that all candidates are aware of what checks we will carry out. We make job offers subject to appropriate satisfactory vetting procedures (where required). In addition to striving to ensure compliance 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.

To uphold our respect for labour rights all our people undergo proof of identity, address and right to work checks in the UK, including reference checking and, where applicable, DBS checks prior to commencing employment. We employ most of our people directly with checks in place to ensure that payment of salary is made direct to that person. In addition to striving to ensure compliance 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 we impose, which includes the requirement to use approved agencies in the recruitment process. Our On-Boarding Procedure seeks to ensure that third party providers can demonstrate that they comply with all legal requirements, including the requirement to comply with the Act.

## Freedom Of Association and Collective Bargaining

We support our colleagues' rights to exercise freedom of association and have extensive consultation and collective bargaining processes in place. We have recognition agreements in place with all of the major trade unions, who collectively consult and negotiate on behalf of some of our colleagues and have engagement with the Chief Executive Officer (CEO) and Group Executives.

## Supporting a Living Wage

We are committed to ensuring our colleagues feel valued for their contributions. As proud signatories of the Living Wage Foundation, we believe that fair pay is essential. Our status as a Recognised Service Provider allows us to collaborate with our customers, creating case studies that highlight the benefits of the Real Living Wage and encouraging them to adopt it. We have achieved our FY24 goal of ensuring 100% of employees, whose salaries we control, are paid the Real Living Wage.

We continuously review our pay rates to ensure they exceed statutory minimums and living wage requirements in all the countries where we operate.

Our dedication extends to working with third-party contractors, ensuring they align with our commitments. We expect them to meet legally mandated minimum wage requirements without imposing unauthorised deductions or financial burdens on their employees.

## Our Suppliers

In 2023, we mapped our supply chain to identify high-risk suppliers using the Global Slavery Index by the Walk Free Foundation helping our understanding of suppliers operating in high-risk areas. As a result, Mitie prioritises these suppliers for further engagement in FY2024 to ensure accountability, transparency, support for worker policies, and take necessary actions where needed.

We hold our suppliers and business partners to the same high standards we set for ourselves. We promote safe and fair working conditions and responsible management of environmental and social issues within our supply chain.

During our onboarding process, suppliers must read and acknowledge our Supplier Social Value Policy and Guidance on Modern Slavery and Human Trafficking. These documents outline key requirements, including mitigating risks associated with slavery and human trafficking. They are available on our external supplier website [www.mitiesuppliers.com](http://www.mitiesuppliers.com), making our expectations clear and improving accessibility and transparency.

Our Standard Terms and Conditions require suppliers to comply with all legal requirements, including the Act.

Sub-contractors must have Alcumus SafeContractor accreditation, which reviews their health & safety compliance, insurances, financial assurance, and best practices, including environmental, GDPR, modern slavery, and right to work. We manage and monitor supplier compliance through:

- **Sourcing:** Our procurement tenders cover all ESG topics, including labour standards, communication within the organization and supply chain, staff training, and ways for employees or suppliers to raise concerns.
- **Contracting:** Our standard terms and conditions require suppliers to comply with all legal requirements, including the Modern Slavery Act.
- **Onboarding:** Suppliers must confirm they acknowledge and comply with our policies.
- **Supplier Management:** Mitie's Supplier Management Framework (SMF) is managed using a balanced scorecard, including meeting Social Value targets for an Ethical & Responsible Supply chain.
- **Health checks:** Our Procurement Centre of Excellence team regularly reviews supplier health risk ratings using data from external API feeds into the Digital Supplier Platform (DSP). These indicators include financial health, compliance, news sentiment, and screening lists.
- **Audit:** We conduct an annual desktop audit of selected SMF suppliers to assess their policies and risk management within their supply chain.

We recognise that supply chain decisions can impact modern slavery risks, such as unrealistic project timelines. To mitigate this, we have established a robust framework of suppliers for our projects. By collaborating closely with them, we provide maximum forward visibility of potential work allocations.

This proactive approach allows our suppliers to develop resource plans that consider our workload and their other commitments. This strategy mitigates demand spikes and ensures our projects and programmes are effectively and ethically resourced. We plan our projects well in advance, benchmarking timelines against industry standards to ensure adequate time for all activities. Additionally, we follow the Construction, Design, and Management Regulations 2015, which mandate a safe work program, aligning with our core values and protecting employee health throughout all construction projects.

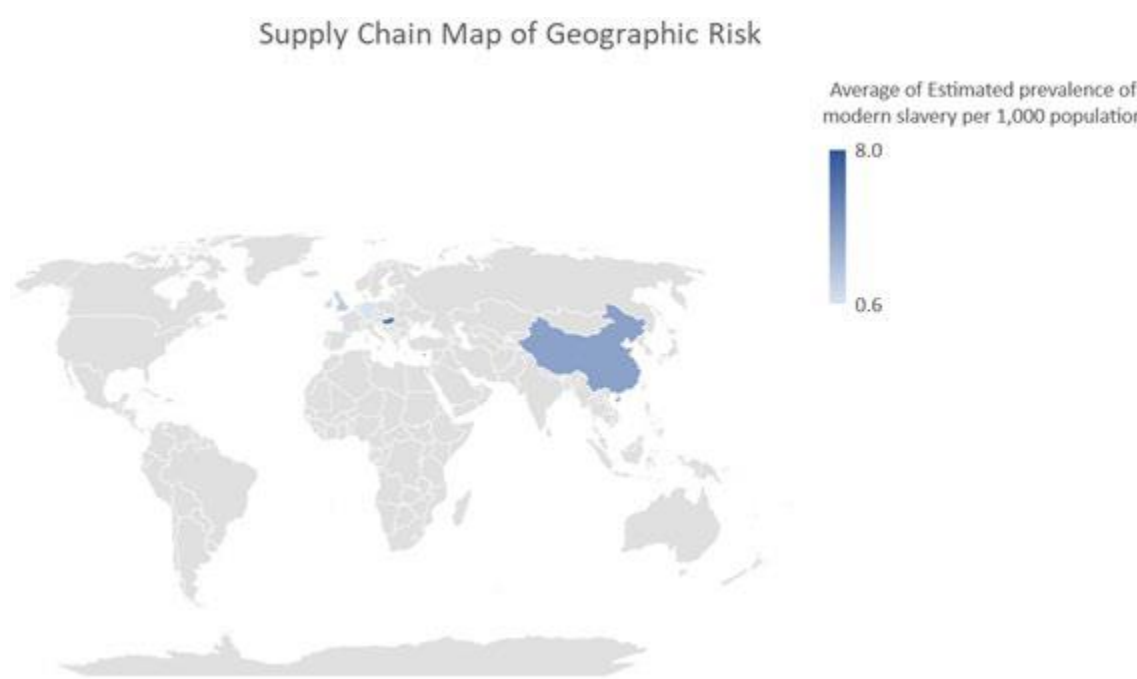
For strategic suppliers, Mitie's SMF includes assessment via a balanced scorecard, capturing actions, risks, and opportunities for collaboration or improvements. The Procurement team also conducts an annual desktop audit of selected Tier 1 suppliers covering Modern Slavery.

Mitie's 'Ways of Working' are guided by our Group Procurement Policies, which align with our supply chain model. These policies are enforced through our Digital Supplier Platform, Coupa, ensuring we control and validate suppliers as they join our system and receive Purchase Orders.

We expect our suppliers to uphold the same high standards we set for ourselves. They must demonstrate that they:

- Do not have modern slavery in their operations
- Provide safe and fair working conditions
- Understand risks within their own supply chain
- Maintain zero tolerance, responsible management, and comply with all legal requirements in their policies, procedures, practices, and contracts with lower-tier suppliers

Managing risk is crucial in how we choose and work with our suppliers, from the start and throughout our partnership. We have identified key geographical risk areas based on our ongoing relationships, industry standards, and geographical index data on modern slavery from the Walk Free Foundation, details of which are set out in the picture below. This helps us make informed decisions and positively influence our supply chain. We are working closely with suppliers in high-risk areas to make sure they follow Mitie’s ethical standards. Our goal is to protect and support everyone involved in our operations and beyond.



Geographic Assessment of Industry Risk	Number of Suppliers	of Vulnerability Score	Prevalence of modern slavery per 1,000 population	Total Spend
China	1	45.5	4.0	£ 156,535.00
Cyprus	1	21.3	8.0	£ 546,238.00
Germany	1	10.7	0.6	£ 1,563,513.00
Hungary	1	18.9	6.6	£ 85,946.00
Ireland	2	9.3	1.1	£ 86,918.00
United Kingdom	253	14.3	1.8	£ 15,341,816.00

## Make-up of our Supply Chain

Location	Industry	% Spend
<b>China</b>	Renewable Energy Equipment	1.00%
<b>Cyprus</b>	General Building Contractor	0.20%
<b>Germany</b>	General Building Cleaning Services	0.10%
<b>Hungary</b>	Recruitment Agency Fees (Permanent Staff)	0.09%
<b>Ireland</b>	General Building Cleaning Services	0.08%
<b>United Kingdom</b>	Electronic Supplies	0.07%
	External Cleaning Services	0.07%
	Flooring Supplies	0.06%
	General Building Services	0.06%
	General Building Supplies	0.06%
	General Electrical Contractor	0.06%
	General Uniform & Clothing	0.05%
	Hospitality & Fine Dining	0.05%
	Laundry Services	0.04%
	Recruitment Costs	0.03%
	Security Intelligence	0.01%

## 6. STAKEHOLDER ENGAGEMENT

### Collaborations and Partnerships

Mitie reports through platforms such as EcoVadis, SEDEX, and the Government Supplier Registration portal. We follow best practice recommendations and take corrective actions when performance falls short of our expectations.

### Cabinet Office

Mitie are collaborative partners with The Cabinet Office. Together we are developing a strategy and accompanying framework which addresses the role of businesses in remediating the issue of modern slavery. This work encompasses the practical implications of strategy and policy in organisations' supply chains and operations. Working with the Cabinet Office we have developed an action plan which includes actions relating to policy development, supplier risk assessments, whistleblowing procedures, training and continuous improvement.

In FY25 will be establishing a pathway of implementation to assist other strategic suppliers in the discovery and remediation of Modern Slavery and development of supportive framework and transparency in business operations that address the ever-prevalent issue of Modern Slavery. This work will include actions to achieve improvement across operations and supply chain through the reporting of selected KPIs.

### Supply Chain Sustainability School (SSCS)

As a Gold partnership member of the SSCS, Mitie has actively participated in a collaborative working group addressing modern slavery in the built environment. This group aims to develop new due diligence resources and update existing ones. Successful outputs include procurement guidance on tackling modern slavery and labour exploitation, revising supply chain mapping protocols, and developing due diligence maturity guidance.

The partnership has produced modern slavery learning pathways for the Mitie supply chain and organised workshops and webinars to collaborate with suppliers and management teams. This ensures better sharing of knowledge, training, and awareness.

## Strengthening Awareness and Training

We continue to strengthen employee awareness of our stance on slavery and human trafficking. We have improved guidance our suppliers which complements the training created 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 should they see or fear something suspicious.

We believe 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 aim to ensure that there are no opportunities to hide forced labour within our organisation or our supply chain.

To further spread awareness, we create articles and information briefings for all our personnel to complement the guidance provided to suppliers. In 2023, working in conjunction with an independent third party, we revised our employee training and awareness programme. We are now taking a targeted approach to more detailed training on slavery and human trafficking (by way of workshop training).

This training will cover colleagues involved in our procurement and recruitment processes, particularly where this involves the promotion and monitoring of agency workers. We will also be developing an online training module which will be accessible by all Mitie employees. In addition, a number of new KPIs will be introduced as part of the revised training programme.

## 7. KEY PERFORMANCE INDICATORS

### Monitoring and Improving Our Efforts

We use key performance indicators (KPIs) to measure how effectively we communicate our core policies and procedures related to the Act. These KPIs help us ensure that colleagues are aware of the risks associated with slavery and human trafficking and can identify potential issues in our business or supply chains.

Our Board is committed to regularly reviewing these KPIs to ensure they remain effective and relevant. By doing so, we can continuously improve our efforts and lead the way in combating modern slavery and human trafficking.

Key Performance Indicators	Status
% of relevant suppliers with published statements	Public
% of suppliers attending awareness raising events (SMF Suppliers)	Public
% of workforce undertaking training session,	Public
% of key spend with supply chain map.	Public
% of Tier 1 suppliers undergoing full audit,	Public
% of the supply chain with grievance mechanism,	Public
% of open grievances within organisation	Private
Number of reported incidents/ prosecutions	Private

### Key Initiatives

#### Enhanced Screening Platform for Third Parties

We have upgraded our screening platform to include more thorough checks for human rights and modern slavery risks. This ensures all our third-party vendors and partners comply with modern slavery laws. By doing this, we show our strong commitment to ethical business practices and to protecting vulnerable individuals.

### ***Ongoing Communications, Training, and Discussions***

We are actively raising awareness and educating our colleagues on human rights and modern slavery issues. This includes regular updates, comprehensive training programmes, and open discussions. By fostering a culture of awareness and vigilance, we empower our colleagues to identify and address potential issues related to modern slavery.

### ***Retrospective Modern Slavery Due Diligence***

We have conducted a thorough review of our past operations and partnerships to identify any instances of modern slavery. This exercise has helped us understand historical risks and to implement corrective actions where necessary. It also reinforces our proactive stance in preventing modern slavery within our supply chain.

### ***Collaboration with the Cabinet Office and Strategic Service Providers***

We collaborate with the Cabinet Office and other key service providers to the government. This partnership allows us to share best practices, resources, and strategies to combat modern slavery. By working closely with government bodies, we position ourselves as leaders in the fight against modern slavery and human trafficking.

### ***Gold Partnership with Supply Chain Sustainability School***

We maintain a gold partnership with the Supply Chain Sustainability School and actively participate in the Modern Slavery Working Group. This partnership provides us with valuable resources, training, and a network of like-minded organisations. It underscores our dedication to sustainable and ethical supply chain practices.

### ***Supporting the Development of a Practical Guide***

We have supported the creation and dissemination of the Supply Chain Sustainability School's guide on addressing modern slavery and labour exploitation in the built environment. This guide serves as a practical resource for other organisations, offering actionable steps to mitigate modern slavery risks. By contributing to this publication, we showcase our leadership and commitment to industry-wide improvements.

## **8. NEXT STEPS**

### ***Strengthen our partnership with Stronger Together***

In FY25, we will deepen our collaboration with Stronger Together, a leading organisation seeking to tackle modern slavery. By leveraging Stronger Together's expertise and resources, we aim to enhance our strategies and initiatives to combat modern slavery and human trafficking (MSHT) within our operations and supply chains. This partnership will help us stay at the forefront of best practices and ensure our efforts are impactful and sustainable.

### ***Continue to follow up on selected high-risk suppliers to understand their management of MSHT in their supply chain***

We will maintain rigorous follow-ups with our high-risk suppliers to gain a comprehensive understanding of how they manage MSHT risks. This ongoing engagement will allow us to identify any gaps or areas for improvement and to work collaboratively with suppliers to strengthen their practices and ensure compliance with our standards. This will expand to Teir 2 and Teir 3 suppliers over time.

### ***Review how human rights and MSHT due diligence is monitored for suppliers not classified as high risk***

We recognise that risks can exist beyond our high-risk suppliers. Therefore, we will conduct a thorough review of our current monitoring processes for suppliers not classified as high risk. This review will help us identify any potential vulnerabilities and ensure that all our suppliers uphold the highest standards of human rights and MSHT due diligence.



***Review how we retrospectively assess and support our SMEs and VCSEs due diligence***

Our commitment extends to supporting small and medium-sized enterprises (SMEs) and voluntary, community, and social enterprises (VCSEs) in their due diligence efforts. We will evaluate our current assessment methods and provide tailored support to these organizations, helping them strengthen their practices and align with our ethical standards.

***Our Modern Slavery Task Force will continue to meet monthly to monitor activities, best practices, and compliance***

Our dedicated Modern Slavery Task Force will continue its monthly meetings to oversee our activities, share best practices, and ensure compliance with our policies. This task force plays a crucial role in driving our anti-slavery initiatives and ensuring we remain vigilant and proactive in our efforts.

***Review how our Ethics Champions can raise awareness on human rights and our MSHT programme*** We will assess the role of our Ethics Champions in raising awareness about human rights and our MSHT programme. By empowering these champions with the necessary tools and knowledge, we aim to foster a culture of awareness and responsibility throughout our organization.

***Continue to refresh and deliver training on modern slavery to key groups, including higher-risk contracts and procurement teams***

Training is a cornerstone of our strategy to combat modern slavery. We will continue to update and deliver targeted training sessions to key groups, particularly those involved in higher-risk contracts and procurement. This ongoing education will ensure our teams are well-equipped to identify and address MSHT risks effectively.

This statement does not refer to finding any ILO indicators of forced labour and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Mitie Group plc's slavery and human trafficking statement for the financial year ending 31 March 2024 as approved by the Board of Directors.

**Phil Bentley**  
**Chief Executive, Mitie Group plc**

**2 October 2024**