

# Slavery and human trafficking statement 2017

## Introduction

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 Group plc has taken during the financial year ending 31 March 2017 to help ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

## Our business

Mitie is a FTSE 250 business providing a wide range of facilities management and professional services, from real estate consultancy, project management, energy consultancy, compliance, risk assessment and security systems to cleaning, catering, engineering, technical and environmental services and a range of specialist services.

We work in partnership with organisations to deliver long-term savings, managing and maintaining some of the nation's most recognised landmarks for a range of blue-chip public and private sector customers.

We are the UK's largest Facilities Management Company, employing some 53,000 people across the country. We operate in the UK, the Republic of Ireland, the Isle of Man, Guernsey, and a number of mainland European countries including, amongst others, Norway, Germany, Spain and Belgium.

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

Further information on our business can be found at: <https://www.mitie.com>

## Our supply chain

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

Occasionally we use temporary labour to support our operational requirements in certain areas (e.g. cleaners, catering staff 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 specifically addressing relevant areas to minimise the risk of slavery or human trafficking occurring 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
- Our Whistleblowing Procedure.

Mitie is currently undertaking a review of all of its policies and procedures. The content of the documents listed above is, therefore, subject to change during the course of 2017-2018.

## **Code of Conduct and Ethical Behavior**

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 all Mitie personnel 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. A copy of the code is available at [www.mitie.com](http://www.mitie.com).

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

## **Our people**

Over and above the requirements of the Modern Slavery Act, we endorse the tenets of the United Nations Global Compact Principles, the International Labour Organisation Declaration on Fundamental Principles and the Rights at Work and the Ethical Trading Initiative 'Base Code'. We strive to 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 endeavour to 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, it is our usual practice to ensure that all applicants are aware of what checks we will carry out. We make job offers subject to appropriate satisfactory vetting procedures (where required).

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 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 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 set out our policies and key procedures. We give all our people access to 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 [www.mitie.com](http://www.mitie.com).

## Supply chain

We expect our suppliers and other business partners to have the same high standards as we impose on our own business. We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain.

As part of our on-boarding process, our suppliers are required to read and acknowledge our Supplier Code of Conduct and our Supplier Guidance – Modern Slavery Act 2015 document. These documents set out key requirements for our suppliers including, amongst other things, the mitigation of risks associated with slavery and human trafficking. It is made available on our external website which makes our expectations clear, and improves the accessibility and transparency of our processes for suppliers

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

## 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 of non-compliance to the Act. We continue to do this and, where areas are identified, we carry out an audit, which will include a focus on compliance with employment as well as other regulatory and sustainability criteria. The defined criteria for assessing potential areas of risk within our supply chain are:

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

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

We enforce our policies and procedures in an effort to ensure that slavery and human trafficking is not taking place anywhere in our business or supply chain.

Our supplier on-boarding process includes standard due diligence procedures, which help us 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 that slavery and human trafficking is not taking place within their own supply chain.

Our procurement team carries 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 another 50 Tier One suppliers for assessment and we continue to analyse our supply chain for potential risk in the light of the changes that will come from the transformation projects currently underway within our business.

If the outcome of an assessment audit identifies any weaknesses in governance, we will seek to agree a detailed plan of action with the supplier to remedy the deficiencies. Failure by a supplier to respond to the questionnaire or to provide assurances that it has satisfactorily assessed its own risk of modern slavery, may lead us to review our business relationship.

## The effectiveness of our processes

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

## Training on slavery and human trafficking

We continue to strengthen employee awareness of our stance 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 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 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 (either by way of workshop training or an e-learning module, as appropriate). This will cover our people involved in our procurement processes and the hiring of staff, especially where this involves the promotion and monitoring of our agency workers.

### **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 Whistleblowing Procedure provides our people and our business partners with the ability to report suspected wrongdoing. This service enables concerns to be reported without fear of retaliation in the knowledge that we do not tolerate harassment, victimisation or reprisals against anyone raising a concern in good faith.

Contact details for the service are widely communicated in multiple languages across our business and supply chain and are made available on our website.

In addition, employees who believe that they have come across an instance of modern slavery (or who may be a victim) and who need information and/or guidance on remedy, compensation and justice will be advised of their right to contact the Modern Slavery Helpline and/or other specialist support and assistance providers across the UK.

### **Our commitment**

This statement 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 2017 as approved by the Board of Directors.

Phil Bentley

**Chief Executive, Mitie Group plc**

3 October 2017