#### MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FY25

#### **REPORTING ENTITY & LEGISLATIVE COMPLIANCE**

This document constitutes Mitie Group plc's Modern Slavery and Human Trafficking (together **modern slavery**) statement for the financial year FY25, 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, in all our operations. This includes our cleaning and hygiene, projects, security, technical services, facilities compliance, supply chain and employer activities. By doing so, we ensure we deliver 'The Exceptional, Every Day'.

This report is divided into the following sections:

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

### I. EXECUTIVE SUMMARY

Mitie works with around 8,800 suppliers, mainly in building works, security, and mechanical & electrical services. In FY25, 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 FY25, 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 FY25

- Completed modern slavery due diligence for all high-risk suppliers
- Achieved a 100% score in the UK Cabinet Office Modern Slavery Assessment Tool (MSAT), up from 87% in FY24
- Scored 87% in the Labour Standards Assessment Tool (LSAT), up from 79% in FY24

- Integrated the EcoVadis platform into the Supplier Management Programme, enabling independent ESG assessments of over 550 key suppliers—covering more than 50% of procurement spend
- Recognised as a Top Employer UK and an Inclusive Top 50 UK Employer for the seventh consecutive year

#### **Achievements FY2025**

- Updated Supplier Code of Conduct to reinforce expectations around human rights and antislavery practices.
- Improved supplier onboarding and ESG health checks to strengthen due diligence and ethical compliance.
- Delivered targeted training to Legal, Procurement, and Contract Management teams.
- Raised awareness through the Action Now platform and the Supply Chain Sustainability School
- Continued automated ESG monitoring across the Preferred Supplier List (PSL), supporting compliance with the Corporate Sustainability Reporting Directive (CSRD) and alignment with the UN Sustainable Development Goals (SDGs)
- Maintained Gold partnership with the Supply Chain Sustainability School and contributed to its guide on addressing modern slavery in the built environment.
- Upgraded third-party screening platform to include more robust checks for human rights and modern slavery risks.
- Conducted retrospective due diligence across past operations and partnerships to identify and address historical risks.
- Collaborated with the Cabinet Office to co-develop a strategic framework for modern slavery remediation and supplier transparency.
- Delivered annual online training refresh for all staff via Kallidus, with targeted workshops for high-risk teams.

#### What Next?

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

- Continuing to follow-up with selected high-risk suppliers to assess their management.
- Reviewing how human rights and modern slavery due diligence is monitored for suppliers not classified as high risk.
  - Retrospective assessment and support for **SMEs and VCSEs** in their due diligence efforts
  - Ongoing quarterly meetings of the **Modern Slavery Task Force** to monitor activities, best practices, and compliance.
  - Expanding the role of **Ethics Champions** to raise awareness of human rights and modern slavery
  - Refreshing and delivering **modern slavery training** 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. 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
- 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 2025 to help ensure that modern slavery is not taking place in any part of our business or supply chain. Our revenue for this year was £5,091m. We have published an annual Modern Slavery Statement every year since 2017, reaffirming our ongoing commitment to transparency and ethical practices. Copies of Modern Slavery Statements from previous years are available on our website <a href="https://www.mitie.com">www.mitie.com</a>.

## **Our Business**

We are the UK's leading technology-led Facilities transformation company. We are 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 Hygiene we hold market leadership positions. We also provide Projects capabilities in the higher growth categories of Buildings Infrastructure, Decarbonization, Fire & Security and Telecoms Infrastructure. We employ 80,000 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 into being 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: <a href="https://www.mitie.com">https://www.mitie.com</a>

#### **Chief Executive Officer Statement**

"At Mitie, being part of our team means more than just doing a job — it's about making a meaningful difference. Every colleague who proudly wears our logo plays a vital role in improving lives across the UK, every single day.

Our five core values are the foundation of everything we do. They guide our commitment to excellence — for our clients, our people, and everyone in our supply chain.

Our people and our values are central to who we are. They drive our unwavering dedication to human rights and our determination to eliminate all forms of modern slavery. We stand firmly against human trafficking, forced, bonded, compulsory, illegal, or child labour. We will never knowingly work with anyone who engages in such practices.

Mitie is continually strengthening our processes to better identify, report, and manage human rights risks. We are committed to setting the highest standards and taking proactive steps to protect human dignity across our operations and partnerships."

### **Our FY25 Statement**

As the UK's leading facilities transformation and professional services company, Mitie continues to play a vital role in reducing modern slavery risks across its operations and supply chain. In FY25, we strengthened our commitment by deepening engagement with suppliers, enhancing training, and improving transparency through digital platforms.

Global challenges, including economic instability, climate change, and geopolitical tensions—have increased the vulnerability of workers and the risk of exploitation. Modern slavery remains a growing concern both in the UK and globally. According to Unseen UK's FY2024 Annual Assessment, the Modern Slavery & Exploitation Helpline handled 11,464 contacts, identifying nearly 5,000 potential victims across more than 2,000 cases—the highest annual number since the Helpline's launch in 2016. Building on the foundations laid in FY24, Mitie has made significant progress in understanding and

addressing modern slavery risks. We have worked closely with internal teams and external partners to embed ethical practices, improve supplier oversight, and empower our workforce to identify and respond to signs of exploitation. This momentum will continue into FY26 as we expand our efforts and strengthen our role as a responsible industry leader.

#### **Our Commitment**

At Mitie, our aim is simple: we work to deliver the exceptional, every day. We're proud to employ 80,000 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 Modern 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 our Chief Legal Officer, is responsible for our ethics compliance strategy and associated policies and governance, including human rights and modern slavery.

# **Board Oversight**

Overall responsibility for Mitie's compliance with human rights legislation and guidance resides with the Board. The Board sets the strategic direction of the business, approves targets, and prioritises material matters relating to human rights and modern slavery.

Progress is monitored through quarterly reporting of key performance indicators (KPIs), whistleblowing summaries, and updates from the Modern Slavery Task Force. These reports include incident trends, supplier audit outcomes, and training compliance rates, enabling the Board to maintain oversight and ensure continuous improvement. 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.
- **Group Procurement Director:** Ensures responsible sourcing and supply chain management to prevent modern slavery in the supply chain.
- **Group Director for Sustainability:** 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. 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 FY25, we worked with both internal and external stakeholders to identify key priorities from a wide range of ESG topics, using various international standards. In FY26, 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 Strategy – Plan Thrive – aligns with the Government's Social Value Model and the UN Sustainable Development Goals. It is embedded across our operations and contracts, driving locally tailored initiatives that reduce workforce inequality and eliminate violence, exploitation, forced labour, modern slavery, human trafficking, and child labour. Plan Thrive focuses on inclusive employment, skills development, wellbeing, and community support, underpinned by a five-step delivery framework. We transparently report progress against our pledges to uplift one million lives and help 1,000 places prosper.



#### 3. POLICIES IN RELATION TO MODERN SLAVERY

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 are 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. The policies were developed by Mitie's internal Legal, ESG, Procurement and HR teams and each policy is reviewed annually and signed off by the Group Chief Executive. 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 <u>People policy</u> 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 <u>Equality</u>, <u>Diversity and Inclusion Policy</u> 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 and forms an integral part of our Mitie induction. Key areas covered include employee wellbeing, diversity and inclusion, ethical business practices, and work-life balance. Mitie emphasises valuing its employees and providing support for their wellbeing. The Mitie Employee handbook is an internal document.

#### Wellbeing

Our well-being 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 <u>Procurement Policy</u>, our <u>Supplier Social Value Policy</u> and <u>our Guidance for Mitie Suppliers on Modern Slavery</u> covers these expectations, and suppliers have to agree to abide by these policies as part of their onboarding process. This information is made available on our mitiesuppliers.com website for review. 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 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. 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 the Mitie Group 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 organisation. They make sure our human rights and modern slavery policies are followed throughout the business. This includes providing training and awareness programmes to employees, workers, and subcontractors to help them recognise and address the risks of modern slavery. Our QHSE team 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 organisation. 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 FY25. 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 104 on Mitie's FY25 Annual Report.

During FY25, 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 FY26. 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 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 by the Board's colleague listening sessions can be found in Mitie's Annual Report 2025, page 105.

#### 4. 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 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 into our operations to protect individuals from any human rights violations.

As a service provider, we understand our crucial role in tackling modern slavery. 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 Vulnerable Groups: Including (but not limited) to those affected by socioeconomic factors, unstable social and political conditions.

The Board, along with our Legal, People Team, Procurement, and Enterprise Risk Management 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.

## 5. DUE DILIGENCE PROCESS

## **Our People**

Mitie is one of the UK's largest private sector employers, with 80,000 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 Organization'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 <a href="https://www.mitiepeople.com">www.mitiepeople.com</a>.

## **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 MGX.

#### 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 FY25 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 FY24, we undertook a comprehensive mapping of our supply chain using the Global Slavery Index from the Walk Free Foundation. This helped us identify suppliers operating in regions with a higher risk of modern slavery and deepened our understanding of potential vulnerabilities.

As a result, in FY25, Mitie is prioritising engagement with these high-risk suppliers through targeted audits, training sessions, and policy compliance reviews to ensure alignment with our ethical standards focusing on strengthening accountability, enhancing transparency, supporting robust worker policies, and taking decisive action where necessary.

We continue to map our supply chain annually to monitor existing suppliers and assess any new additions. This ongoing process ensures we remain vigilant to emerging risks and maintain a proactive approach to protecting human rights across our operations.

## **Supporting SMEs and VCSEs**

Mitie recognises that small and medium-sized enterprises (SMEs) and voluntary, community, and social enterprises (VCSEs) may face unique challenges in implementing robust modern slavery due diligence. To support these organisations, Mitie provides tailored guidance, access to training resources, and ongoing engagement through supplier forums and the Supply Chain Sustainability School. This ensures that SMEs and VCSEs are equipped to meet ethical standards and contribute to a responsible supply chain.

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. These documents outline key requirements, including mitigating risks associated with slavery and human trafficking. They are available on our external supplier website <a href="https://www.mitiesuppliers.com">www.mitiesuppliers.com</a>, 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 conducts an annual desktop audit of selected Tier I 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

In FY25, Mitie made significant strides in strengthening transparency and ethical practices across its supply chain, with a particular focus on modern slavery risk management. Recognising the growing challenges posed by climate change, economic instability, and exploitation, Mitie sharpened its sourcing strategy through supply chain mapping, ESG health checks, and improved supplier onboarding.

A key advancement was the integration of the EcoVadis platform into Mitie's Supplier Management Programme (SMP). This enables independent, standardised assessments of over 550 key suppliers, representing more than 50% of procurement spend, across four critical areas:

- Environment
- Labour and human rights
- Ethics
- Sustainable procurement

This integration supports:

- Automated ESG monitoring across the Preferred Supplier List (PSL)
- Identification of modern slavery risks and areas for improvement
- Compliance with the Modern Slavery Act, the Corporate Sustainability Reporting Directive (CSRD), and alignment with the UN Sustainable Development Goals (SDGs)

Mitie also delivers targeted training to Legal, Procurement, and Contract Management teams, with wider awareness raised through the Action Now platform and the Supply Chain Sustainability School. These initiatives empower employees and suppliers to spot and respond to modern slavery risks, while regular audits and supplier engagement ensure high standards are upheld.

# **Supply Chain Mapping**

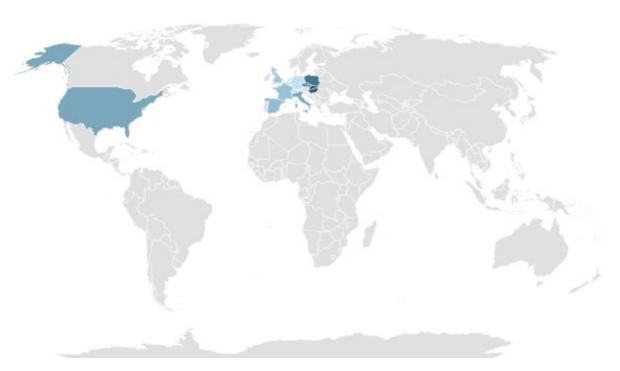
Managing risk is crucial in how we choose and work with our suppliers, from the start and throughout our partnership. We have identified key geographical risk areas based on our ongoing relationships, industry standards, and geographical index data on modern slavery from the Walk Free Foundation, details 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.

We have 2,555 of suppliers that, from our desktop research, operate in an industry or sector that is considered to be high risk for modern slavery. This map shows where our higher risk suppliers operate globally and using data from the Global Slavery Index, shows estimated prevalence of modern slavery per 1,000 population in that country.

We have included all countries who have a vulnerability score of over 10% in the GSI, allowing us to prioritise the highest risk countries. This helps us make informed decisions and focus on the areas of our supply chain at highest risk and allowing us to have the most effective impact.

# Supplier Mapping of Modern Slavery Prevelance





Country	Number of Suppliers	Vulnerability Score (%)	Estimated prevalence of modern slavery per 1,000 population	Estimated Net Value
<b>United States</b>	I	24.53	3.30	£50,352
Italy	I	21.70	3.26	£1,216,282
Poland	5	18.99	5.51	£155,551
Hungary	13	18.92	6.57	£82,817
Slovakia	6	16.39	7.65	£28,842
United Kingdom	2469	14.32	1.80	£768,802,910
Switzerland	13	13.64	0.50	£228,452
France	17	13.25	2.06	£381,752
Czechia	9	12.54	4.24	£144,738
Belgium	П	10.81	0.97	£444,971
Germany	9	10.66	0.56	£69,817
Spain	I	10.37	2.31	£294,497

#### 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 organisation's 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, we established a supplier pathway toolkit to support strategic suppliers on their journey to improved modern slavery reporting and integration into their operations. This toolkit is designed to assist the discovery and remediation of modern slavery, and the development of supportive frameworks and transparency in business practices. This work included actions to drive improvement across operations and the supply chain through the reporting of selected KPIs.

## **Supply Chain Sustainability School (SCSS)**

As a Gold partnership member of the SCSS, Mitie supports The Built Environment Against Slavery Group, the UK's largest anti-slavery collaboration in the built environment. The SCSS is made up of major UK infrastructure clients, FM service providers, main contractors, suppliers and sub-contracts and looks at opportunities to drive a common approach to combatting modern slavery and labour exploitation, through the upskilling of their own workforce and the wider supply chain.

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

# Case Study: Collaborating with Tier I Suppliers to Tackle Modern Slavery

At Mitie, we are committed to working closely with our Tier I suppliers to strengthen modern slavery risk management across our supply chain. A standout example of this collaborative approach is our ongoing partnership with Bunzl, one of our largest strategic suppliers.

Bunzl's robust approach to identifying and mitigating modern slavery risks has been recognised within our Best Practice Supplier Framework, which supports other suppliers in enhancing their sustainability practices. Through regular engagement, we share insights, align on expectations, and promote continuous improvement in tackling modern slavery.

Our collaboration with Bunzl includes:

- Ongoing dialogue on risk identification, mitigation strategies, and opportunities for improvement.
- Knowledge sharing, including access to key resources such as Bunzl's Supplier Code of Conduct,
   Asia factory audit report template, and supplier conformity statement.
- Transparency in governance, with Bunzl providing access to their Modern Slavery Statement, Ethical Sourcing Policy, Speak-Up Policy, and relevant sections of their annual report.

Bunzl also actively participates in multi-stakeholder initiatives, including the Responsible Labour Initiative and the SCSS. As part of their SCSS partnership, Bunzl is developing modern slavery training aligned with Mitie's own programme, aimed at increasing awareness and capability across both their workforce and supplier base.

This partnership exemplifies how meaningful supplier engagement can drive greater visibility, capability, and accountability across complex supply chains—helping us and our partners to better prevent and address modern slavery risks.

# Case Study: Powering Transparency – Custom Solar's Stand Against Modern Slavery

Custom Solar is leading the way in ethical solar procurement by proactively addressing the risk of modern slavery in the solar supply chain. With growing global concern over the use of forced labour in the production of polysilicon, a key material in solar panels, Custom Solar launched a comprehensive due diligence programme to trace material origins and assess supplier practices, going well beyond standard compliance.

By working closely with Solar Energy UK, Custom Solar has championed industry-wide traceability protocols and became one of the first UK companies to offer traceable solar modules, including LONGi's CRE product. Their approach sets a new benchmark for transparency, supplier accountability, and ethical sourcing in the renewable energy sector.

## **Strengthening Awareness and Training**

We continue to strengthen employee awareness of our stance on modern slavery. We have improved guidance for our suppliers which complement 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 FY25, we advanced our commitment to tackling modern slavery by implementing a revised employee training and awareness programme, developed in collaboration with an independent third party. Building on the foundations laid in FY24, we adopted a more targeted approach, introducing workshop-based training focused on modern slavery risks.

Mitie also launched an Action Now module focusing on modern slavery. Action Now is Mitie's internal engagement programme designed to embed sustainability across its operations by focusing on frontline teams through bitesize learning modules. The initiative delivers quarterly themes that spotlight key areas of environmental and social learning. These efforts are part of Mitie's commitment to strengthening visibility and accountability across its supply chain and operations, ensuring that modern slavery risks are proactively addressed at every level of the business. The launch of the module was supported by registering modern slavery as a group risk and a resource pack distributed to managers to engage with their teams on the topic. The courses are readily available anytime for review on Mitie's learning and development platform; Kallidus. It is encouraged that all staff complete these on an annual review basis.

## 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.

Key Performance Indicators	Status
83% of relevant suppliers with published statements	Public
66% of suppliers attending awareness raising events (SMF Su	ippliers) Public
11% of workforce undertaking training session,	Public
38% of key spend with supply chain map.	Public
100% of Tier 1 suppliers undergoing full audit,	Public
100% 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.

## Gold Partnership with Supply Chain Sustainability School

We maintain a gold partnership with the SCSS and actively participate in the Built Environment Against Slavery Group. This partnership provides us with valuable resources, training, and a network of likeminded 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 SCSS'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

# Strengthening our partnership with Stronger Together

In FY26, 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 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 modern slavery in their supply chain

We will maintain rigorous follow-ups with our high-risk suppliers to gain a comprehensive understanding of how they manage modern slavery 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 Tier 2 and Tier 3 suppliers over time.

# Review how human rights and modern slavery due diligence are 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 modern slavery due diligence.

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

Our commitment extends to supporting SMEs and 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 the 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.

# Reviewing how our Ethics Champions can raise awareness on human rights and our modern slavery programme

We will assess the role of our Ethics Champions in raising awareness about human rights and our modern slavery programme. By empowering these champions with the necessary tools and knowledge, we aim to foster a culture of awareness and responsibility throughout our organisation.

# Continuing to refresh and deliver training on modern slavery to key groups, including higherrisk contracts and procurement teams

Training and awareness 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 modern slavery risks effectively.

This statement confirms that no indicators of forced labour, as defined by the International Labour Organization (ILO), were identified within Mitie's operations or supply chain during the reporting period. These indicators include abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime. 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 2025, as approved by the Board of Directors.

Phil Bentley
Chief Executive, Mitie Group plc
29 September 2025