Sustainability & Social Value Policy

Purpose and scope

Mitie believe in the value of sustainable actions. We deliver sustainability and social value through our joint strategies, Plan Zero and Plan Thrive, supported by our Climate Transition Plan, CSRD-aligned disclosures and our commitment to creating Better Places and Thriving Communities. We are committed to the Paris Agreement to substantially reduce global greenhouse gas emissions to limit global temperature increases to 1.5°C through our validated science-based target and pledge to be Net Zero Carbon by 2035 across all scopes.

We commit to a circular economy, protecting biodiversity and empower our people to limit our environmental impact on the planet. We pledge to increase social value through everyday operations, leaving a legacy for the communities in which we work to support a brighter future for all, aligning to the United Nations Sustainable Development Goals (UNSDGs). We will maintain appropriate governance, controls and evidence over sustainability-related data and disclosures, including clear ownership, review and assurance processes, to support accurate, balanced and decision-useful reporting.

This policy sets out how we manage our approach to be a sustainable, circular, energy efficient, environmentally, and socially responsible business. It applies to all employees, in all our operating countries.

Policy objectives

The objectives of this policy are to:

- Deliver sustainable profitable growth while satisfying our moral, legal, and contractual obligations.
- Have satisfied clients and make a positive contribution to the communities in which we work.
- Enable our people to be engaged, safe and respected.
- Ensure the availability of information and necessary resources to achieve objectives and targets.
- Commit to reduce our use of fossil fuels, chemicals, energy, water, waste, and natural resources.
- Strive to mitigate or eliminate our impacts on the environment (pollution or impact to land, air, water, natural resources, and biodiversity)
- Reduce our energy consumption, carbon emissions and costs and enhance our environmental performance.
- Ensure that our solutions align with the principles and practices of the circular economy.
- Promote apprenticeships and skills pathways, incorporating inclusive recruitment
- Have an aligned supply chain
- Ensure our sustainable approach is applied to all new services and markets.

Requirements

Moral, legal, and contractual obligations: We must understand and fulfil our moral, legal, and contractual obligations and ensure these are taken into account in our operations. Contractual obligations must be documented, and processes must be in place to evaluate fulfilment of these.

Clients: All our businesses must have the right systems and processes in place to nurture relationships with clients and provide the reassurance that we will deliver sustainable development opportunities throughout our service delivery. Customer satisfaction is the key measure of our success in this area and all operations, and customer relationship management should be undertaken with client satisfaction in mind.

People: We must ensure we have the right talent pipeline to fulfil all the future needs of our businesses. A comprehensive people strategy makes sure that we provide the performance management, engagement, and leadership training to help our people achieve their full potential. This will include group-wide communications campaigns, e-learning programmes, and regular employee engagement to measure success. We must make sure that the well-being of our people, and by extension our clients and the general public, is safeguarded while at work. Our Health and Safety systems and supporting programmes identify risk and have mitigation measures in place to drive safe working behaviours. Our policy requirements detailed within our **People policy** and **Equality, diversity and inclusion policy** and **Health and Safety policy** supports these requirements.

Social Value & Responsible Business: Contributions should be made to the communities in which we work. Through Plan Thrive and The Mitie Foundation we encourage all our stakeholders to support social mobility programmes under Education, Employability and Enterprise focus areas to increase vocational education and employability prospects; employee volunteering; via our flagship Ready2Work and Business Challenge Day programmes for disadvantaged members of the community. Mitie's focus for Social Value aligns with the 5 pillars of Employment, Responsibility, Community, Environment, and Innovation. We continue to make great progression in each of these focus areas, and www.mitie.com/esg covers these high-level achievements. We are committed to conducting business responsibly by respecting human rights, promoting fair and safe work, and preventing modern slavery, forced labour and labour exploitation across our operations and supply chain.

Environmental and Energy management: We will ensure our people understand our environmental impacts and are provided with the information and resources to reduce them. Sustainability awareness must also include looking at opportunities to enhance our environmental and energy performance. Through our Plan Zero Initiative, we will implement and document environmental, energy and carbon management systems to reduce and mitigate our impacts wherever possible in the journey to a net zero carbon future. Fuel consumption will be kept to a minimum through improved vehicle selection procedures, telematics that optimise route planning, and driver awareness campaigns. We are committed to removing fossil fuels from our fleet and built environment. We will support energy and environmental performance improvements in the design, procurement, operation, maintenance and modification of our facilities, equipment, and vehicles.

Resource *not* Waste (Protecting Resources): We will adopt circular thinking and prioritise re-use of material over recycling through, education and integrating innovations into tailored solutions which support us as we transition to a more circular approach in alignment with upcoming legislation.

Supply chain: We will strive to provide sustainable value on every contract and encourage our supply chain partners to support us in achieving our clients' sustainable objectives and drivers to maximise value for all our stakeholders. We will act in a responsible manner when it comes to selecting supply chain partners and use our influence to enhance the environmental performance throughout the value chain. Small and medium sized businesses, minority owned organisations, voluntary, community and social enterprises will be used where viable as part of our supplier engagement strategy.

New markets: We must understand and adopt our commitment to sustainability, environmental impacts and energy reduction when looking at growth opportunities in new markets, through organic growth or acquisitions. We include a robust sustainability due diligence as part of the process when looking at new potential markets.

Report our performance: We will report publicly on our environmental emissions and impacts within our Annual Report, our web site (**www.mitie.com/esg)** and CDP. We report in accordance with Government guidance for company reporting of Greenhouse Gas (GHG) emissions and apply the DEFRA conversion factors for GHGs. We are measured by a number of external Sustainability Indexes and will achieve and maintain the highest standards as applicable to our business.

Governance, data and disclosure controls: We will maintain appropriate governance, controls and evidence over sustainability and social value data, targets, claims and disclosures. This includes clear ownership, review and approval processes, alignment with applicable reporting requirements, and proportionate assurance to support accurate, balanced and transparent reporting to stakeholders.

Driving and promoting continual improvement: Meaningful and sustainable objectives and targets shall be used to drive continual improvement in our environmental and social value delivery. Regular reviews on the ways in which we work will be carried out to identify risks and the opportunities for improvement that underpin and sustain the success of our organisation. Management at all levels shall review their risks, objectives, and processes, at defined intervals, to ensure their continuing suitability, adequacy, and effectiveness.

Responsibilities

The CEO is responsible for:

- Setting the Group ESG strategy and ensuring Executive Board competencies; and
- Reviewing, endorsing, and achieving this policy's aims.

The Group Director for Sustainability and The Group Director for Social Value are responsible for:

- Administering this policy on behalf of the CEO.
- Developing and rolling out the supporting strategies to drive continual performance improvement.; and
- Communicating sustainable, energy, environmental and social value information to relevant interested stakeholders.

The ESG Committee is responsible for:

- Identifying the ESG priorities that most significantly impact the Company, its stakeholders, and its reputation.
- Approving the ESG strategy of the Mitie Group on an annual basis, which strategy shall then be submitted to the Mitie Board for final approval and adoption.
- Promoting, overseeing, and monitoring the implementation of the ESG strategy on behalf of the Mitie Group.
- Ensuring Mitie Group conducts its business in a responsible way, and which is consistent with the ESG strategy.
- Reviewing the Company's performance against its ESG strategy and targets, initiatives, and commitments
- Reviewing and recommending for approval the relevant sections of the Annual Report, Mitie's ESG Report any other sustainability-related public documents, including the Modern Slavery Act Statement; and
- Considering Mitie's position on relevant emerging sustainability issues, and when appropriate, recommend Group targets and/or subscription to sustainability related commitments.

ESG Risk and ESG Working Groups are responsible for:

- Implementing social value, sustainability, environmental, people and ethical business and climate-related initiatives that achieve the Company's objectives in line with the ESG strategy.
- This group is responsible for identifying, assessing, and mitigating climate-related risks, and for realising opportunities such as decarbonisation services and energy transition projects.
- Reviewing risks and opportunities and providing the framework for setting and reviewing objectives and targets.
- Identifying and delivering actions to achieve Mitie's ESG strategy (Plan Zero and Plan Thrive initiatives) for carbon reduction and social value; and
- Maintaining regular reviews of our performance and update the policy as required.

Divisional/Business Managing Directors are responsible for:

- Ensuring that this policy and supporting procedures are distributed, implemented, and complied with.
- Leading by example in protecting the Mitie brand and communicating effectively; and
- Driving continual improvement performance across the organisation.

Managers are responsible for:

- Implementing and enforcing the processes and procedures.
- Ensuring that their people are aware of their responsibilities and receive appropriate training; and
- Addressing any inappropriate behaviour.

Employees are responsible for:

- Carrying out their work in line with this policy and associated procedures.
- Challenging any behaviour that falls short of the expectations of this policy; and
- Identifying any breaches of this policy and reporting them to their line manager.

What will successful implementation of this policy achieve?

- Qualitative and quantitative data trends that are continually improving and publicly reported.
- Recognition by external bodies in the form of nominations, awards, and accreditations; and
- Improved benchmarking results when examining our performance against our peers or when audited by independent assurers and external groups.

Phil Bentley
Chief Executive Officer
Mitie Group PLC

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