

MITIE is committed to proactively developing mutually beneficial and sustainable trading relationships with all of our stakeholders, based on a foundation of trust and co-operation. This policy provides the framework and demonstrates our commitment to developing and implementing ethical business practices throughout the organisation.

We have a duty to act responsibly and to show highest levels of environmental, ethical and social stewardship in delivering quality services. Our core values align with the principles of the UN Global Compact principles and our supply chain partners are selected and reviewed on the basis of their ability to implement ethical business practices.

## Sustainability

Sustainability is integral to our business and influences the way in which we interact with all of our stakeholders. Our Chief Executive takes ultimate responsibility for sustainability and is supported in this role by the Executive Board, main Board Directors and specialists including the Heads of Health, Safety and Environment, Sustainability, Fleet Management, Property Management, Shared Services and a business-wide network of Sustainability Champions implementing a varied programme of initiatives across the UK.

## Responsible procurement and supply chain management

We will procure goods and services sourced and produced in compliance with current legal requirements that provide value for money, but we must consider social, ethical and environmental impacts of any supplier we use.

As part of our sustainability strategy and supplier engagement approach we're keen to provide opportunities for supported businesses, minority owned and operated businesses, and third sector enterprises. We also encourage our suppliers to monitor the sustainable credentials of their own suppliers.

We have a Procurement Forum which is responsible for:

- adopting and sharing best practice purchasing and supply standards and initiatives throughout MITIE;
- developing mutually beneficial collaborative trading relationships with suppliers and subcontractors increasing the accountability and environmental performance of our supply chain; and
- promoting sustainable and ethical purchasing and supply policies, practices and procedures.

## Environment

We are conscious of the impacts that our business operations may have on the natural environment and we endeavour to minimise and mitigate such effects where possible, by utilising environmentally benign materials and practices. We measure, monitor and publicly report our environmental impacts, and ensure initiatives are in place to reduce energy consumption, recycle waste materials and minimise unavoidable greenhouse gas emissions.

## Responsible selling and marketing

We're committed to using responsible marketing and selling practices that honestly and fairly represent our abilities to undertake the services we offer to the benefit of the business and our clients, taking into account appropriate social, ethical and environmental considerations.

## Business integrity core values

We adopt the highest ethical standards and responsibilities and this policy applies to all of our stakeholders including our employees, agents, clients, suppliers, subcontractors, investors, competitors and the general public in the following areas:

- data protection-related information and client confidentiality will be safeguarded;
- insider dealing will not be tolerated;
- conflicts of interest will be declared;
- bribery and corruption will not be tolerated;
- anti-competitive practices will not be tolerated;
- supplier, agent and client relationships and payment practices will be fair and equitable, inducements, gifts or facilitation payments will not be given or received; and
- donations to political organisations will not be made.

### Conflicts of interest

Any employee who suspects or knows that there is a conflict of interest in relation to any business matter involving MITIE must inform the Group Business Risk Department or report through the whistle-blowing channels outlined in [MG(G)150] without delay.

Examples of potential conflicts of interest include business transactions involving relatives, friends or close associates of MITIE's employees.

### Bribery

Bribery is a form of corruption and can be defined as any offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of MITIE's business anywhere in the world.

Bribery is also a criminal offence under the Bribery Act 2010, under which offences include:

- Bribing another person (offering, promising or giving a bribe);
- Being bribed (requesting, agreeing to receive or accepting a bribe);
- Bribing foreign public officials (offering, promising or giving bribed to such officials);
- Intending to induce the improper performance of a relevant function or activity of a public nature or any activity connected with a business (whether MITIE's or another business); and
- Payments made to facilitate the award of contracts to MITIE (known as "facilitation payments").

The following documentation provides further information on the practical effect of this legislation, including acceptable and unacceptable examples of client and staff entertaining.

The Bribery Act 2010 – introduction and response [\[MG\(G\)004\]](#)

The anti-corruption and bribery Policy [\[MG\(Pol\)005\]](#)

The business expenses and entertaining Policy [\[MG\(Pol\)003\]](#)

The entertaining Procedure [\[MG\(P\)002\]](#)

### Zero tolerance approach to bribery and other forms of corruption

MITIE operates a zero tolerance approach to bribery and other forms of corruption. Acts of bribery and other forms of corruption, and failure by employees to report such acts when

they reasonably suspect or know another employee has committed them, will be treated as gross misconduct for the purposes of disciplinary action and may result in summary dismissal if appropriate. Bribery also constitutes a criminal offence and, as such, would require MITIE to notify the relevant government agency.

### **Reporting bribery and other forms of corruption**

Employees who wish to report an act or genuine suspicion of bribery or other form of corruption should follow the Whistle-blowing policy [\[MG\(Pol\)17\]](#) without delay. All concerns raised will be dealt with confidentially, in accordance with that policy.

No employee will suffer demotion, dismissal or any other adverse consequences for refusing to pay a bribe or behave in any other corrupt manner, even if this refusal may result in MITIE losing business. If you are asked to pay a bribe or behave in any other corrupt manner, you should inform your line manager (if appropriate) and follow the Whistle-blowing policy [\[MG\(Pol\)17\]](#) without delay.

### **Human rights and labour standards**

We endorse the tenets of the Global Compact principles, International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the Ethical Trading Initiative 'Base Code' and will ensure that;

- employment is freely chosen;
- freedom of association is respected;
- working conditions are safe and hygienic;
- child labour shall not be used;
- wages are not lower than minimum wage;
- working hours are not excessive;
- no discrimination is practiced;
- regular employment is provided; and
- no harsh or inhumane treatment is allowed.

Compliance with the above conditions is included in our Supplier Sustainability Questionnaire and is a prerequisite for business engagement.

### **Lobbying**

Although we do not directly participate in political activity, we will engage in policy debate on subjects of legitimate concern to us, our people and the communities in which we operate. We will maintain open and honest relationships with government, its agencies and representatives. The Executive Committee monitors our lobbying activities to ensure that they align with our core values. Employees and consultants employed by us to communicate with government must at all times make sure that the information they provide is accurate and complete and complies with all applicable laws and regulations that relate to public affairs.

This policy and all related policies, programmes and KPIs are reviewed by myself at least annually.



Ruby McGregor-Smith  
Chief Executive  
MITIE Group PLC

19/07/2011