

Guidance for Mitie Suppliers on Modern Slavery and Human Trafficking

Mitie Approach and Expectations of Suppliers

Mitie will not tolerate human trafficking, slavery or forced labour of any type, and will only engage with suppliers that share this same value, complying with all relevant legislation.

Mitie's approach to Human Rights is available at www.mitie.com, together with the Mitie [Modern Slavery Act statement](#) that we enforce through our policies and procedures in an effort to ensure that slavery and human trafficking is not taking place anywhere in our supply chain.

From selection, onboarding, and ongoing management of suppliers used across our supply chain; we work to ensure suppliers demonstrate what steps they take to ensure that:

- modern slavery is not present in their company, goods, or services.
- safe and fair working conditions are provided.
- risks within their own supply chain are understood.
- zero tolerance, responsible management and compliance with all legal requirements is reflected in their policies, procedures, practices and in any contracts with lower tier suppliers.

Selection

Mitie Procurement led tenders includes assessment of ability to perform as defined as well as taking into consideration social values, ethical practices (Modern Slavery) and environmental impacts. New suppliers are asked for details of their policies on labour standards, including modern slavery and human trafficking, and how that is communicated within their organisation and supply chain. As appropriate, we also explore whether they have carried out MSA risk assessments, provided training for staff and checked how employees or suppliers can raise potential MSA concerns.

Onboarding

The Mitie supplier onboarding process includes standard due diligence checks to assess the suitability of suppliers to provide goods and services against required standards. This process captures confirmation that suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chain.

Ongoing Management

Mitie's Supplier Management Framework is used to manage ongoing performance of key and critical suppliers and as part of this, the ethical and sustainable supply metrics include a review of supplier alignment to Mitie Policies and Modern Slavery Act compliance.

The Procurement team have carried out desktop audits to provide assurance that suppliers are responsible partners in our service delivery. This involves an assessment of selected Tier I suppliers and if the outcome identifies any weaknesses in governance, we 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.

New Procurement team members induction training includes MSA awareness training via our internal 'Anti-Slavery e-learning module'. This is available to all Mitie staff that manage key supplier contracts and we currently looking into making something similar available to our suppliers too.

Improving Supply Chain Awareness

Supplier Social Value Policy

This document provides detailed requirements for Social Value and Sustainable Procurement and is available at [Supplier Guides | Mitie Suppliers](#)

Focus on high-risk categories of spend.

Mitie have implemented a digital supplier platform (DSP) which is used to manage all key supplier information and has improved ease of identification & reporting for any suppliers operating in industries with typically higher risk of modern slavery (including construction; recruitment/Labour; hospitality; and food)

Classification of our supplier spend by category is standard practice at Mitie, so categories that relate to these types of industries will require suppliers bidding for work to assure us that they have adequate measures in place, which may be over and above the standard checks made.

Supplier Management Framework (SMF)

Mitie SMF is an established, consistent process used to manage the performance of its key suppliers. Suppliers are required to share their policies and processes and demonstrate their compliance to key contractual requirements, KPI & SLAs. As part of these reviews, we look for evidence and examples of what steps are being taken by suppliers on Modern Slavery, such as awareness training for employees and/or their supply chain, KPIs and audit activities.

Support for our Suppliers.

Mitie hold Supplier Days and 'Meet the Buyer' events where suppliers can learn more about working with Mitie. These sessions are used to highlight requirements for suppliers and outline where support can be found (including MSA, Social Value and Sustainable Procurement)

Supply Chain Sustainability School

Mitie are partners with the Supply Chain Sustainability School and encourage our suppliers to access the free resources that are available on modern slavery and all aspects of the environment and social value.

Reporting Concerns

Mitie do not expect supplier staff to put themselves at any risk by raising concerns. MSA violations are serious and organised criminal gangs may be responsible, so we would encourage all staff who suspect any violation to call the confidential national helpline or report online at:

 0800 0121 700

<https://www.modernslaveryhelpline.org/>

In that way staff are protected from any potential personal risk, which may be an issue if raising concerns directly to those supervising suspected victims.

Internally, Mitie staff report concerns through the confidential Whistleblowing Line. Under circumstances where an investigation is required, we may require suppliers to suspend work until they can assure us that there are no risks, or that changes have been made to address any concerns.

We also expect suppliers to act upon any information they have identified through their own MSA checks and immediately communicate to us where incidences of modern slavery have been found within a Mitie supply chain, by reporting that to their Procurement and Mitie Group Procurement Director

Further Guidance

We encourage all suppliers to learn more and investigate other resources designed to help organisations develop practical approaches to addressing MSA. Some useful links for further guidance links are provided below:

Modern slavery Gov resources:

- <https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>
- [Modern Slavery Awareness booklet \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- [Transparency in supply chains - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Guidance on response to modern slavery:

- [BS 25700:2022 Organizational responses to modern slavery – Guidance | BSI \(bsigroup.com\)](https://www.bsigroup.com)

Practical guidance and tool kits:

- [Resources - Stronger Together \(stronger2gether.org\)](https://stronger2gether.org)