

Mitie Group Security Policy

Purpose and scope

Mitie is a forward-looking and innovative company dedicated to supporting a modern security culture within its structure. To achieve this Mitie has introduced measures to support, protect, identify and respond to security threats and risks related to the conduct of its business.

This policy applies to all businesses within Mitie, as well as our suppliers, partners and stakeholders that work with Mitie or require access to our people, assets, information, infrastructure.

Policy Definitions

People – All employees, visitors, representatives and associates, including customers, suppliers, contractors and visitors.

Assets - An Asset is either something Mitie acquires, purchases or creates, or otherwise belongs to a customer or supplier in relation to which Mitie is responsible. Assets can be both tangible and intangible and have a value, whether directly financial or not.

Information – Includes all communications, reports, assessments, instructions, specifications, details and facts which are capable of being stored, viewed, copied or transferred by any method, including electronic, paper, visual, imaging and conversation whether created by or held by Mitie for its own use or on behalf of a customer, supplier, stakeholder or third party.

Infrastructure – The fundamental facilities and systems required for Mitie to operate, including IT networks, technology, buildings, utility supplies and systems.

Responsible Person - The Business Managing Director or Functional Lead is responsible for:

- Managing and ensuring effective control of security
- Improving the effectiveness of security
- Ensuring security threat assessments are completed
- Reporting the security status for each business.

Investigation and Reporting

- Managing Directors shall, at the earliest opportunity report to Corporate Security any security matter that could result in serious injury or death of personnel, significant loss or damage to the company's assets or Infrastructure or significant loss or unauthorised access to information. Upon an issue being identified corporate security shall investigate or oversee any investigation into potential or threatened security breaches, incidents or suspicious activity, and shall report to the appropriate business lead as appropriate.
- Managing Directors and Functional Leads shall ensure that where appropriate, any learning from a security incident is shared within the organisation to develop understanding and reduce the likelihood of repeat breaches or incidents.

Responsibilities

The responsible person

- Shall hold overall responsibility for security to ensure that the security policies, procedures and standards are implemented and maintained for their business in line with this Security Policy and any relevant statutory, government or contractual security requirements.
- Is required to ensure that actual and potential security threats to their people, assets, information and infrastructure are regularly assessed, updated and monitored to ensure that appropriate security mitigations have been implemented. These assessments shall reflect the security principles listed in Appendix A.
- Must ensure that a security threat and risk assessment is conducted annually and reviewed half-yearly to identify any potential or actual security threats to their Business. These assessments will determine any additional security controls or training required to mitigate the threat.
- Will ensure that appropriate checks are applied in a timely manner to all employees and contractors either located on or requiring unescorted access to the Mitie Group or to customer and partner sites or equipment. These checks must be conducted within the parameters of the appropriate legislation and be appropriate to the work that the individual will be engaged in.
- Have a responsibility to ensure that where significant organisational events are undertaken outside of Mitie Group premises a security risk assessment is undertaken and if appropriate, security be provided for the event.
- Shall ensure that an independent assurance of their business security measures is conducted at least once every two years.
- Will ensure that all staff receive and complete security training that is appropriate to their role and responsibilities and have appropriate access to national security guidance and company prepared information.
- The Responsible Person shall identify the key security indicators relevant to their area of business.

The CEO is responsible for:

- Reviewing, endorsing and achieving this policy's aims.

The Group Enterprise Risk Director is responsible for:

- Administering this policy on behalf of the CEO; and
- Developing and rolling out the supporting strategies to drive continual performance improvement.

The ERM Team is responsible for:

- Providing competent advice to the PLC board and facilitation to executive management, and any other key stakeholders, to help them comply with established policies and procedures; and
- Monitoring the day-to-day implementation and effectiveness of the framework.

The PLC Board is responsible for:

- Ensuring an ERM approach is adopted, integrating internal control and strategic planning. This framework will make sure that material risks are brought to the PLC Board's attention and that appropriate mitigation strategies are in place to manage these risks and that these are effective.

Divisional/Business Managing Directors are responsible for:

- Ensuring that this policy and supporting strategies and procedures are distributed, implemented and complied with;
- Making sure that significant risks which have the potential to impact positively or negatively upon Mitie are identified, assessed, measured and reported to the Group ERM team;
- Putting appropriate risk measurement criteria in place and implementing control strategies;
- Ensuring that the overall level of exposure and nature of risk is within the risk appetite of the Group; and
- Leading by example in protecting the Mitie brand and championing knowledge sharing across the divisions.

Functional leads are responsible for:

- Ensuring appropriate risk management frameworks exist for their areas of risk under their responsibility;
- Ensuring that the control strategies are implemented; and
- Providing assurance to the divisional / business managing directors and / or executive management that the controls are effective.

Managers are responsible for:

- Implementing and enforcing the processes and procedures;
- Making sure that their people are aware of their responsibilities to manage or respond to identified risks and receive appropriate training;
- Ensuring that effective risk management, reporting and monitoring arrangements are in place for all business critical activities, and encouraging their teams to be positive both in responding to the identified risk and in seeking to capitalise on any opportunities in the market; and
- Addressing any inappropriate behaviour.

Employees are responsible for:

- Taking personal responsibility and demonstrating good behaviours is fundamental to good security. It is for each employee to work within the Mitie Group's Code of Conduct and this security policy to preserve a secure working environment
- It is the responsibility of all employees to safeguard and protect assets, information and infrastructure from loss, damage, disclosure or misuse in accordance with company policy and procedures and any legal, regulatory or contractual requirements.
- Any breach or suspected breach of the security policy shall be reported by any person promptly to local managers and escalated as appropriate. An investigation shall be conducted and reported in accordance with the requirements set out in section 2 of this policy notwithstanding any criminal or civil obligations.

What will successful implementation of this policy achieve?

- Transform the Group Security function and inspire our people to deliver and display the exceptional security practices
- Develop our security posture through intelligence-led and risk based approach
- Deliver a coordinated approach through clear security policy, standards, unified structures and inclusive working
- Enable consistent delivery through inspection, review and reporting
- Develop capability by aligning security priorities with business growth opportunities



Phil Bentley
Chief Executive Officer
Mitie Group PLC

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