

# CODE OF CONDUCT



**STATOM GROUP**

# OUR CONDUCT, OUR PRINCIPLES, OUR FUTURE!



## Introduction from the Chairman - Tommy Brown

The construction industry is evolving rapidly. Fuelled by innovation and technology, the sector is set to transform more in this decade than it has over the past century. This pace of change presents Statom Group with both an opportunity and a responsibility to navigate these developments in an ethical and compliant manner.

As a leading engineering company, we are keeping up with technological advancements by ensuring that our workforce, along with those individuals and companies doing business on our behalf, are equipped to make the right decisions and take the right actions. Our Code of Business Conduct provides the foundation for our policies, procedures, and guidelines, holding ourselves and our business practices to the highest standards.

Our Code also outlines our responsibility to treat people fairly, provide a safe and healthy work environment, and act with the highest integrity. All of this is grounded in our core values, which for many years have inspired our employees to put the safety, well-being, and needs of the communities and clients we serve first.

Together, our core values and our Code of Business Conduct are critical in enabling Statom Group to full fill our mission of building safer, more sustainable, and impactful projects that improve the communities where we work.

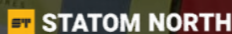
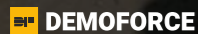
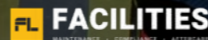
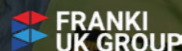
I am proud to lead a company that strives to be a model of ethical leadership in the construction industry. Our continued success depends on all employees—at every level, in every market where we operate—doing the right thing for our clients, workers, and communities. This is why all employees have a responsibility to read, acknowledge, and comply with our Code of Business Conduct.

This unwavering commitment to ethical and compliant leadership behaviours will guide Statom Group as we continue to build the future of the construction industry for years to come.



At Statom Group we believe acting ethically and responsibly is not only the right thing to do but also the right thing to do for our business. Our Statom Code of Conduct ensures that we hold ourselves and how we do business to a high standard, allowing us to fulfill our obligations

**STATOM GROUP**



# INTRODUCTION

The values and principles spelled out in Our Code of Conduct serve as our compass; the STATOM Code of Business Conduct (“Code”) is the road map that helps us stay on course with these values. The Code sets basic requirements for business conduct and serves as a foundation for our Company policies, procedures, and guidelines, all of which provide additional guidance on expected behaviours.

We need to help each other to understand and apply our Code of Conduct in everything we do. This Code of Conduct provides essential guidance on how we interact with one another and uphold the values that define our business.



## HOW WE CONDUCT OUR BUSINESS

Every employee duty is responsible to be familiar with and follow the relevant laws, regulations, and Company policies and procedures that govern the business activities in which the employee engages. In meeting the needs of those who rely on our buildings, infrastructure, and construction services – whether it’s, communities, workers, or stakeholders – everything we do must be of the highest quality. This commitment extends to every aspect of our operations, from design, planning to construction, and inspection. We strive to achieve the highest standards and integrity in every phase of the construction process by:

**Complying with all applicable laws, regulations, and standards** governing building codes, construction practices, safety, and environmental impact to ensure the structural integrity and sustainability of our projects.

**Upholding ethical, safety, and environmental standards** throughout all construction activities, including the planning, permitting, and execution phases, while fully adhering to local, national, and international legal requirements.

**Ensuring the safety and well-being of workers, contractors, and the public** by providing a safe working environment, following strict safety protocols, and complying with health and safety laws to prevent accidents and promote worker welfare.

**Complying with all local, state, and federal regulations** related to land use, zoning, environmental impact assessments, and building permits to secure approval for all construction projects before commencing.

**Adhering to industry standards in construction quality** including quality controlling materials, workmanship, and construction processes, and meeting all applicable standards for durability, performance, and aesthetics.

**Keeping up with evolving industry standards and technologies** to ensure that we provide modern, efficient, and sustainable solutions, offering ongoing training and guidance to support our values and improve construction practices.

**Following legal and ethical guidelines for marketing and promoting our services**, ensuring that all representations made about the scope, quality, and timeline of our projects are clear, truthful, and consistent with project approvals and regulatory guidelines.

**Continuously monitoring the quality, safety, and performance** of completed construction projects, addressing issues proactively and ensuring compliance with all required reporting protocols for defects, safety concerns, and warranty claims.

**Promoting sustainable construction practices** by adhering to environmental laws and regulations, and adopting green building principles that minimize the ecological impact of our projects.

By consistently applying these principles in everything we do, we ensure that every construction project we undertake serves the highest standards of quality, safety, and integrity, benefiting the communities we serve.

## RESPECTFUL COMMUNICATION

### YOUR RESPONSIBILITY

**Be Respectful:** Treat everyone with kindness, respect, and courtesy, both in online and offline interactions. We foster an environment where all voices are valued.

**Listen Actively:** Be attentive and considerate when others speak. Encourage open dialogue, and refrain from interrupting. All perspectives are important.

**Disagree Respectfully:** Healthy debate is a natural part of collaboration.

### INCLUSIVITY AND DIVERSITY

**Promote Inclusivity:** We embrace the richness of diversity, including backgrounds, cultures, and ideas. Actively seek to engage with and include individuals from all walks of life.

**Zero Tolerance for Discrimination:** STATOM Group maintains a zero-tolerance policy toward discrimination, harassment, or bullying in any form, based on race, ethnicity, gender, sexual orientation, disability, religion, or any other characteristic.

**Support Accessibility:** We are committed to making all materials, platforms, and events accessible to people with disabilities. We proactively work to address and accommodate accessibility needs.



## INTEGRITY AND ACCOUNTABILITY

### YOUR RESPONSIBILITY

**Honesty and Transparency:** Always be truthful in your interactions and take ownership of your actions. Transparency builds trust within the organisation.

**Respect Confidentiality:** We prioritise confidentiality, and respecting sensitive information related to individuals, projects, or business activities.

**Follow Legal and Ethical Standards:** Adhere to all applicable laws, regulations, and ethical standards relevant to your role within STATOM Group.

## PROFESSIONALISM

### YOUR RESPONSIBILITY

**Maintain a High Standard of Work:** Strive for excellence in everything you do. Collaborate effectively with others to achieve shared goals, and take pride in the quality of your work.

**Punctuality and Responsibility:** Honor your commitments. Meet deadlines, attend meetings on time, and proactively communicate if circumstances prevent you from fulfilling your obligations.

**Respect Boundaries:** Be mindful of both personal and professional boundaries. Ensure your conduct remains respectful and appropriate in both professional settings and social interactions.



## PERSONAL APPEARANCE & JEWELLERY

We support individual expression at work, including piercings, provided appearance remains professional and appropriate for the role. The Company may require jewellery to be removed, covered, or kept discreet where needed for client-facing work, operational requirements, or health and safety.

## SAFE AND HARASSMENT-FREE ENVIRONMENT

### YOUR RESPONSIBILITY

#### Zero Tolerance for Harassment:

Harassment, including verbal, physical, or sexual harassment, will not be tolerated in any form.

**Create a Safe Space:** Foster an environment where all individuals feel safe expressing themselves without fear of intimidation or discrimination.

**Report Violations:** If you witness or experience a violation of this Code, please report it immediately to Human Resources. We will handle all concerns with the utmost confidentiality, and those who report will be protected from retaliation.

## COLLABORATION AND COMMUNITY BUILDING

### YOUR RESPONSIBILITY

**Work Together:** Collaboration is key to our success. Engage respectfully with colleagues, offering constructive feedback and support where needed.

**Be a Mentor:** Share your knowledge and skills generously. Support the growth and development of others, and encourage them to reach their full potential.

**Encourage Participation:** We believe everyone should have the opportunity to share their ideas. Create an environment where all voices are heard, especially those who may feel marginalised.



## ENVIRONMENTAL AND SOCIAL RESPONSIBILITY

**Act Responsibly:** Be conscious of how your actions impact the community, environment, and broader society. We are all stewards of the world around us.

**Support Sustainability:** Contribute to efforts that promote sustainability. Minimise waste, adopt eco-friendly practices and support initiatives that benefit society.

### Your Responsibility

You are personally responsible for knowing, understanding, and complying with STATOM Group's Code of Conduct.

You also have a responsibility to uphold the Code of Conduct.

You have a responsibility to identify and report in good faith any potential or actual violations of the Code of Conduct or related concerns through consultation and/or reporting.

- If you become aware of a potential unethical, illegal or fraudulent action, or other violation of Statom policy, whether committed by a colleague, client, supplier, contractor or other individual or organisation associated with the firm, it is important that you report the circumstances through an appropriate reporting channel.
- Many situations can be resolved with open discussion and consultation and/or our reporting channels. However, when this is not possible or when confidential assistance is preferred, you can do so by emailing directly to [hr@statom.co.uk](mailto:hr@statom.co.uk) and your concern will be investigated confidentially and steps will be taken to address the situation appropriately.
- While the Code of Conduct is robust, it is not exhaustive. You are encouraged to refer to the appropriate sources for updated organisational policies, regulations and professional standards that can be found on SharePoint under My Employment.



# CONCLUSION

At STATOM Group, we believe in the power of collaboration, respect, and accountability. By following this CODE OF CONDUCT, we can ensure that our work environment is inclusive, supportive, and conducive to success. Thank you for your commitment to upholding these principles and helping us build a positive and thriving business.



