



STATOM HOLDINGS Limited (Statom Group Limited, Statom Group North Ltd, Statom Plant Ltd, Statom Remediation Ltd, Demoforce Group Ltd, FL-Facilities Group Ltd, Slipform Technology Ltd, Spark Tech MEP Ltd, Franki Foundations UK Ltd, Martello Piling Ltd) ("Statom", "the Company")

We are committed to high standards of professional conduct, integrity and accountability. As a leading civil engineering and construction organisation, we recognise that the behaviour and standards of our people are fundamental to building a strong, respectful culture and protecting our reputation as a trusted industry leader.

We expect everyone working for or on behalf of the Company to act with professionalism, respect and responsibility at all times, reflecting our values and supporting a positive working environment. Clear standards of behaviour are essential to ensuring safety, quality and effective collaboration across our projects and teams.

1. Purpose

The purpose of this policy is to protect the integrity of Statom Group's decision-making process and to ensure that all employees and stakeholders act in the best interests of the organization.

2. Definition

A conflict of interest occurs when an individual's personal interests (financial, familial, or otherwise) could potentially influence their professional decisions or actions within Statom Group.

3. Scope

This policy applies to all workers, directors, contractors and subcontractors of Statom Group Ltd.

4. Types of Conflicts

- **Financial Interests:** Ownership or investment in competing businesses or suppliers.
- **Personal Relationships:** Close relationships with individuals who may benefit from decisions made within the organization.
- **Gifts and Benefits:** Acceptance of gifts or benefits that could influence business decisions.

5. Disclosure

Employees and stakeholders must disclose any potential conflicts of interest to their immediate supervisor or the HR department. This includes situations that arise during the course of employment.

6. Evaluation

Once disclosed, the conflict will be evaluated by management. Appropriate steps will be taken to mitigate any potential conflict, which may include reassignment of duties or recusal from decision-making processes.

7. Consequences of non-disclosure

Failure to disclose a conflict of interest may result in disciplinary action, up to and including termination of employment.

8. Training and Awareness

All employees will receive training on recognizing and managing conflicts of interest. Regular reminders and resources will be provided to ensure ongoing awareness.

9. Review and Amendment

This policy will be reviewed annually and may be amended as necessary to reflect changes in regulations or organizational practices.

10. Acknowledgment

All employees are required to sign an acknowledgment form indicating that they have read, understood, and agree to comply with this policy.

11. Review

This policy will be reviewed annually or in response to any regulatory or technological changes that impact Statom Group's data security or destruction procedures.

AUTHORISED AND SIGNED

SIGNED



Gavin Hunt
Chief Development Officer

Review: Annually
Date: 01/06/2026
Next Review: 01/06/2027

SIGNED



Martina Oyite
Chief People Officer

Review: Annually
Date: 01/06/2026
Next Review: 01/06/2027

This policy is subject to annual review and approval by the Board.