



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

This policy sets out Statom Group's approach to providing references for current and former employees, ensuring compliance with UK employment law, the Data Protection Act 2018, and UK GDPR. It provides clear guidance to staff on who is authorised to provide references and how they must be handled.

### 2. Scope

This policy applies to:

- All employees of Statom Group and its subsidiaries.
- Any authorised managers providing references on behalf of the Group.

### 3. Authorisation

- Only Directors and authorised managers may provide employment references on behalf of Statom Group.
- Employees may provide personal or character references, but must clearly state that they are acting in a personal capacity and not on behalf of the Group.
- Personal references must not be on Group letterhead and should be sent from the individual's personal email or home address.

### 4. Data Protection and Consent

- Employment references will only be provided if the employee has given explicit consent in accordance with the Data Protection Act 2018 and UK GDPR.
- Any reference request received from a third party must be verified as genuine. This is usually achieved by obtaining a signed consent form from the employee. If there is doubt, the authorised manager must confirm authenticity with the employee before responding.

### 5. Content of Employment References

Statom Group will provide factual references only, unless otherwise authorised by a Director. Factual references may include:

- Start and end dates of employment.
- Job title(s) held.

- Brief description of duties and responsibilities (only if requested).

No subjective comments, opinions, or ratings should be included unless explicitly authorised.

## 6. Responding to Requests

- All reference requests must be forwarded to an authorised manager or Director.
- References must be issued promptly and in line with statutory obligations.
- Records of all references provided should be maintained securely for accountability and audit purposes.

## 7. Subject Access Requests

- Employees and ex-employees have the right to access information the Group holds about them under subject access provisions of the Data Protection Act 2018 and UK GDPR.
- Requests must be submitted in writing to HR and will be processed in accordance with statutory timescales.

## 8. Legal Compliance and Risk Mitigation

- References will be factual, accurate, and provided in good faith.
- The Group will not include information that could be discriminatory or defamatory.
- Managers must avoid speculation or commentary that could expose the Group to claims of unfair treatment, defamation, or discrimination.

## 9. Responsibility

The HR Director is responsible for ensuring that all staff and authorised managers understand and comply with this policy.

## 10. Review

This policy will be reviewed at least annually or sooner if statutory guidance, legislation, or operational requirements change.

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### AUTHORISED AND SIGNED

SIGNED



Stan Nikudinski  
CEO Statom Group Ltd.

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.*