



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, Frankis Piling 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.

Purpose

Statom Group recognises that responsible business conduct is essential to sustainable growth, trusted client relationships and long-term value for our people, communities and stakeholders. This policy defines the Group's approach to corporate social responsibility ("CSR") and provides the framework through which we integrate social, environmental and ethical considerations into business decisions and project delivery.

Our objective is to deliver high-quality construction and engineering services while creating positive employment, skills, community and environmental outcomes and preventing harm arising from our operations.

2. Policy principles

Our CSR approach is built around six principles:

Principle	What it means in practice
People and opportunity	Creating fair access to employment, development and progression.
Safe and inclusive workplaces	Protecting health, safety, dignity and wellbeing.
Community value	Supporting local employment, skills, education and community priorities.
Environmental responsibility	Reducing adverse environmental impacts and using resources responsibly.
Ethical and accountable business	Acting lawfully, transparently and with integrity.
Measured delivery	Setting proportionate commitments, retaining evidence and reporting outcomes.

3. Scope

This policy applies to all directors, employees, workers, agency workers, apprentices, trainees and interns working for Statom Group. Relevant expectations also apply to consultants, contractors, subcontractors, labour providers, suppliers and other business partners where they work for, represent or support the Group.

The policy applies to our offices, yards, workshops, construction sites, joint-working arrangements and community activities. Project-specific client requirements may supplement this policy but must not reduce its standards.

4. Employment, skills and inclusive opportunity

Statom Group will use its position as an employer and construction partner to widen access to sustainable careers and build industry capability. We will:

- Recruit and select on merit, skills, experience and potential using fair, objective and transparent processes.
- Advertise roles through appropriate internal, external and local channels and use accessible recruitment practices.
- Promote apprenticeships, graduate opportunities, work experience, professional development and structured earn-and-learn routes.
- Engage with schools, colleges, universities, employment services and training organisations where this supports project and community needs.
- Encourage participation from groups underrepresented in construction, while avoiding unlawful positive discrimination.
- Monitor workforce and recruitment information where lawful and proportionate to assess the effectiveness of our practices.
- Require relevant labour providers and subcontractors to uphold equivalent standards of fairness, dignity and lawful employment.

5. Equality, diversity, inclusion and dignity at work

We are committed to a workplace in which everyone is treated fairly, respectfully and without unlawful discrimination. We will:

- Comply with the Equality Act 2010 and other applicable equality legislation.
- Prevent and address discrimination, harassment, sexual harassment, bullying and victimisation.
- Make reasonable adjustments for disabled applicants, employees and workers where required.
- Provide fair access to pay, benefits, training, promotion and career development.
- Promote inclusive leadership, respectful behaviour and appropriate challenge of unacceptable conduct.
- Provide confidential routes for concerns and protect individuals from retaliation for raising concerns in good faith.

6. Health, safety and wellbeing

Protecting people is a core social responsibility. Statom Group will maintain effective arrangements to eliminate hazards and manage occupational health and safety risks. We will:

- Provide safe systems of work, suitable supervision, competent resources and appropriate training.
- Consult the workforce and encourage prompt reporting of hazards, near misses and unsafe behaviour.
- Promote mental health awareness, early support and access to available wellbeing services.
- Manage fatigue, occupational health risks and workplace stress within our operational control.
- Expect the same high standards from contractors and supply-chain partners.
- Consider the safety and wellbeing of neighbouring residents, visitors, road users and other people affected by our activities.

7. Community and social value

We will seek to create a positive and lasting legacy in the communities where we operate. Our project and Group activities may include:

- Local employment, labour and supply-chain opportunities.
- Apprenticeships, work experience, careers engagement, mentoring and employability support.
- Engagement with schools, colleges, local authorities, community organisations and client social-value teams.
- Employee volunteering and practical support for local initiatives.
- Charitable fundraising, matched or corporate giving where approved, and targeted partnerships aligned with community need.
- Support for community sport, youth development, homelessness, social mobility, health and wellbeing initiatives.

- Responsible donation or reuse of suitable surplus materials and equipment where lawful, safe and authorised.

Project commitments must be realistic, approved, linked to the contract and supported by a delivery plan. We will not make tender commitments that the responsible business unit cannot resource, evidence or deliver.

8. Environmental responsibility

Statom Group will manage environmental impacts arising from its operations and seek practical opportunities to improve resource efficiency. We will:

- Comply with environmental legislation, permits, client requirements and applicable management systems.
- Prevent pollution and manage noise, dust, vibration, traffic, water and waste impacts.
- Apply the waste hierarchy by preventing waste and prioritising reuse and recycling where practicable.
- Use energy, water, fuel and materials responsibly and seek lower-impact options where technically and commercially viable.
- Monitor and reduce greenhouse-gas emissions within our operational control, including plant, transport and energy use.
- Protect biodiversity, habitats and local amenity where our work could affect them.
- Engage the supply chain on environmental performance and responsible sourcing.

9. Ethical business and responsible governance

We will conduct business honestly, lawfully and transparently. Statom Group maintains zero tolerance for bribery, corruption, fraud, facilitation payments, modern slavery, human trafficking and other financial or ethical misconduct.

We will:

- Comply with applicable anti-bribery, anti-fraud, sanctions, tax, competition and financial-crime requirements.
- Identify and manage actual, potential and perceived conflicts of interest.
- Complete proportionate due diligence on clients, suppliers and business partners.
- Maintain accurate financial and operational records and prohibit false or misleading reporting.
- Protect confidential information, personal data and intellectual property.
- Provide appropriate whistleblowing and reporting channels and investigate credible concerns.
- Cooperate with lawful audits, investigations and regulatory requirements.

10. Human rights, labour standards and modern slavery

We respect internationally recognised human rights and expect lawful, fair and humane working conditions throughout our operations and supply chain. We will:

- Prohibit forced labour, debt bondage, human trafficking and child labour.
- Complete right-to-work checks and require compliant labour-supply arrangements.
- Pay employees and workers in accordance with applicable wage and contractual requirements.
- Respect lawful freedom of association and trade union activity.
- Prevent exploitation, unlawful deductions, retention of identity documents and abusive recruitment fees.
- Assess and escalate modern-slavery risks and concerns in accordance with Group procedures.

11. Responsible procurement and supply chain

Suppliers and subcontractors are important partners in delivering our CSR commitments. Selection and management will take account of proportionate social, environmental and ethical considerations alongside safety, quality, competence, value and delivery capability.

We may require supply-chain partners to:

- Comply with the Statom Group Supplier or Contractor Code of Conduct and relevant policies.
- Demonstrate lawful employment, right-to-work, tax and payment arrangements.
- Provide workforce, training, environmental or social-value information where contractually required.

- Participate in project social-value and community activities where appropriate.

Address identified non-compliance through corrective action, with suspension or termination considered for serious or repeated breaches.

12. Charitable giving, sponsorship and volunteering

Charitable donations, sponsorship and volunteering must support a legitimate community or social purpose, protect the Group's reputation and comply with approval, financial-control and anti-bribery requirements.

Before committing Group funds, assets or employee time, the sponsor must confirm:

- The identity and legitimacy of the beneficiary organisation.
- The purpose, value and intended outcome of the support.
- That the activity does not create an improper influence, personal benefit or conflict of interest.
- That appropriate approval has been obtained and the contribution is accurately recorded.
- That safeguarding, insurance, health and safety and data-protection requirements have been addressed where relevant.

13. Governance and responsibilities

13.1 Board of Directors

Approve the Group CSR framework and provide oversight of material risks and commitments. Promote responsible business conduct and ensure adequate governance arrangements are maintained.

13.2 Chief People Officer / Policy Owner

- Maintain this policy and coordinate Group reporting on people, community and social-value matters.
- Provide guidance on equality, employment, skills, volunteering and charitable activity.
- Escalate material concerns or significant non-delivery to the appropriate Executive or Board forum.

13.3 Directors and business leaders

- Embed CSR considerations into business planning, bids, mobilisation, procurement and project delivery.
- Approve only commitments that are achievable, funded and capable of being evidenced.
- Assign clear ownership and review performance within their area of responsibility.

13.4 Project managers and functional leads

- Deliver agreed actions, maintain evidence and report performance accurately.
- Engage clients, communities and partners professionally and escalate barriers promptly.

13.5 Employees and workers

- Act responsibly and in accordance with this policy and related procedures.
- Participate in approved initiatives where appropriate and report concerns or suspected breaches.

14. Planning, measurement and reporting

Where CSR or social-value commitments form part of a project, bid or client agreement, the responsible team must establish a proportionate delivery plan. This should identify:

- The commitment and intended outcome.
- The accountable owner and supporting partners.
- The delivery period and required resources.
- The measurement method and evidence required.
- Progress, risks, corrective actions and completion status.

Reporting must be accurate, evidence-based and capable of audit. We will distinguish between activity delivered, outputs achieved and longer-term outcomes. We will not knowingly exaggerate, duplicate or misrepresent social-value results.

14.1 Illustrative reporting measures

Area	Examples of evidence and measures
Employment and skills	Local hires; apprenticeship weeks; work-experience placements; training hours; careers engagement.
Diversity and inclusion	Workforce profile; disclosure rates; recruitment and progression outcomes; reasonable-adjustment activity.
Community	Volunteer hours; beneficiaries; community investment; partner feedback; completed initiatives.
Environment	Waste diverted from landfill; resource use; emissions; environmental incidents; improvement actions.
Supply chain	Local or SME spend where measured; supplier participation; due-diligence completion; corrective actions.
Wellbeing and safety	Training; engagement; leading indicators; wellbeing initiatives; relevant safety performance.

15. Raising concerns and non-compliance

Any person who becomes aware of conduct inconsistent with this policy should report it to their line manager, the relevant functional lead, HR or through the Group's whistleblowing arrangements. Concerns will be handled proportionately, confidentially where possible and without retaliation against anyone who raises a concern in good faith.

Breaches may result in corrective action, disciplinary action, removal from site, termination of contract or referral to an external authority, depending on the nature and seriousness of the matter.

16. Related policies and documents

- Equal Opportunities and Diversity Policy.
- Recruitment Policy.
- Health and Safety Policy and associated arrangements.
- Environmental Policy and project environmental plans.
- Modern Slavery and Human Trafficking Statement / Policy.
- Anti-Bribery and Corruption Policy.
- Anti-Fraud and Financial Crime procedures.
- Whistleblowing Policy.
- Data Protection and GDPR Policy.
- Supplier and Contractor Code of Conduct.
- Charitable Giving, Sponsorship or delegated-authority procedures, where applicable.

17. Review and continuous improvement

The Chief People Officer will review this policy annually, or earlier where legislation, Group structure, client requirements or material risks change. Statom Group will use audit findings, stakeholder feedback, workforce data and project performance to improve its approach and strengthen the quality of social and environmental outcomes.

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.