

# OUR CONDUCT. OUR PRINCIPLES. OUR REPUTATION.

## STATOM GROUP CODE OF CONDUCT

For Employees | Agency Workers | CIS Subcontractors | Consultants



# STATOM GROUP



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# OUR CONDUCT, OUR PRINCIPLES, OUR FUTURE!



**TOMMY BROWN**  
GROUP CHAIRMAN



## Introduction from the Chairman:

Statom has grown significantly, but the principles on which we built the business remain fundamental to everything we do.

We operate across specialist construction, civil engineering and infrastructure, delivering complex projects through our people, technical capability, specialist businesses and self-delivery model.

With growth comes responsibility.

How we behave is as important as what we build.

Every person working for, through or on behalf of Statom has a responsibility to work safely, act honestly, treat people with respect and protect the reputation of the Group.

This Code sets out the standards we expect from our employees, agency workers, CIS subcontractors and consultants.

It provides a common standard regardless of where you work, which Statom business you support, or the contractual arrangement under which you are engaged.

We do not compromise safety, quality, integrity or ethical standards for programme, commercial gain or convenience.

Our clients, colleagues, communities and supply-chain partners must be able to trust us to do what we say we will do and to do it properly.

Our continued success depends on everyone taking personal responsibility for their actions, speaking up when something is wrong and maintaining the standards on which Statom's reputation has been built.

## TRUST RELIABILITY REPUTATION

**Those principles must be evident  
in how we work every day.**

## WHO ARE WE?

**Statom is a specialist construction, civil engineering and infrastructure group.** We began with core expertise in groundworks, reinforced concrete frames and remediation and have developed broader capability across complex civil engineering and specialist construction.

**Our work includes, across the relevant Group businesses:**

- CIVIL ENGINEERING & INFRASTRUCTURE
- GROUNDWORKS
- REINFORCED CONCRETE FRAMES & STRUCTURES
- DEMOLITION & REMEDIATION
- PILING, FOUNDATIONS & GEOTECHNICAL
- MEP AND BUILDING SERVICES
- PLANT & SPECIALIST
- SPECIALIST CONSTRUCTION EQUIPMENT
- ASSOCIATED FACILITIES & CONSTRUCTION

## OUR APPROACH TRUST



### RELIABILITY

Our colleagues, clients and partners must be able to depend on us.



### REPUTATION

Every person working with Statom contributes to our reputation.



### RELATIONSHIP FIRST

We build strong professional relationships and work collaboratively to achieve the best outcome.



### SELF DELIVERY

We invest in people, skills, plant, systems and technical capability and take accountability for delivery.

## WHO THIS CODE APPLIES TO

**This Code applies to:**

**For everyone working for, through or on behalf of Statom**  
**For this Code, references to "you" mean everyone covered by it.**

The Code applies while working:

- On Statom sites
- At client or principal contractor sites
- In offices, yards and workshops
- While travelling on Company business
- In Company vehicles
- At work-related events
- When using Company systems or equipment
- Online where activity relates to Statom, its people, clients or projects.

You must also comply with applicable site, client and principal contractor requirements.

## YOUR STATUS

This Code sets standards of conduct. It does not, of itself, alter the legal basis on which anyone is employed, supplied or engaged, or create guaranteed work or mutuality of obligation where none otherwise exists. Employment status is determined by applicable law and the reality of the working relationship. For employees, this Code is non-contractual unless expressly incorporated into the contract of employment.

For this Code, "Statom" means the relevant Statom Group company and "Company" means your employing or engaging Statom entity, where applicable.

## RESPECT

Treat everyone professionally, fairly and with dignity.  
Healthy disagreement is acceptable.

Bullying, intimidation, abusive behaviour, humiliation or threatening conduct is not. Listen to others, communicate respectfully and challenge ideas without attacking individuals.

## INTEGRITY & ACCOUNTABILITY

Be honest.

Take responsibility for your decisions and actions. Do not conceal mistakes, falsify information or deliberately mislead colleagues, clients, managers, auditors or investigators. Raise issues when you identify them rather than allowing them to become someone else's problem.

## PROFESSIONALISM

You are expected to:

- Attend work reliably and on time
- Follow reasonable instructions
- Meet agreed commitments
- Work collaboratively
- Maintain appropriate professional boundaries
- Communicate properly
- Complete required training
- Maintain required competence, licences and qualifications
- Take pride in the quality of your work.

## EQUALITY DIVERSITY & INCLUSION

Statom is committed to equality of opportunity and dignity at work. **We will not tolerate unlawful:**

- Discrimination
- Sexual harassment
- Retaliation
- Harassment
- Victimisation

This applies regardless of role, seniority, employment status or working location.

## LEADERS

Seniority does not create an exemption from this Code.

Managers and supervisors have an additional responsibility to:

- Lead by example
- Challenge poor behaviour
- Address concerns promptly and apply standards consistently
- Ensure people are appropriately trained and supervised
- Support Statom in taking all reasonable steps to prevent sexual harassment, including by third parties
- Act promptly where inappropriate behaviour is seen or reported
- Escalate serious issues through the appropriate Statom function.

# SPEAK UP & CONSEQUENCES



## INVESTIGATIONS

You must cooperate honestly with authorised investigations.

You must not:

- Destroy evidence
- Alter records
- Fabricate evidence
- Deliberately mislead an investigator
- Interfere with witnesses
- Retaliate against someone participating in an investigation

Statom will treat information confidentially so far as reasonably possible.

## SPEAK UP

If something appears:

**unsafe | unlawful | dishonest | fraudulent | discriminatory | harassing | sexually harassing | exploitative | unethical raise it.**

You are not expected to investigate a concern yourself or prove wrongdoing before reporting it.

Depending on the issue, you can contact

- Your supervisor or manager
- The Site or Project Manager
- SHEQ
- Human Resources
- The Chief People Officer
- Another appropriate senior manager or Director; or
- Another reporting route available under the Whistleblowing Policy.

Agency workers may also raise matters with their agency or labour provider. If the concern involves your manager, use another appropriate reporting route. Statom will not subject anyone to retaliation or detriment because they raised a concern, made a protected disclosure, acted as a witness or assisted an authorised investigation. Protected disclosures are governed by applicable law. Nothing in this Code requires use of an internal route where the law permits disclosure to a prescribed person, regulator or other legally protected route.

## NO RETALIATION

Retaliation or detriment against anyone because they have raised a concern, made a protected disclosure, acted as a witness or assisted an authorised investigation will not be tolerated.

## SERIOUS OR CRIMINAL MATTERS

Where appropriate, Statom may refer a matter to a client, principal contractor, Police, HSE, HMRC, Home Office or another appropriate regulator or authority.

**An allegation will not automatically be treated as established before the relevant circumstances have been considered.**



# SAFETY, QUALITY & OPERATIONAL CONDUCT

## SAFETY FIRST

**Nothing is more important than the health and safety of our workforce, clients and the public.**

**You must:**

- Comply with inductions, RAMS, permits and safe systems of work
- Follow site and project rules
- Use required PPE
- Work only where trained, competent and authorised
- Use plant, vehicles, tools and equipment safely
- Never bypass a safety control
- Report unsafe conditions, incidents and near misses
- Cooperate with safety inspections and investigations
- Stop and seek advice where work cannot be undertaken safely.

**Programme, cost or productivity pressure never justifies unsafe working.**



## QUALITY & COMPETENCE

**You must:**

- Work within your competence and authority
- Follow approved drawings, specifications and methodologies
- Maintain accurate inspection and quality records
- Report defects and technical concerns
- Never conceal defective or incomplete work
- Never falsify testing, inspection or certification records.



## ATTENDANCE, TIME & RECORDS

All records must be accurate.

**You must not:**

- Clock or sign another person in or out
- Allow another individual to use your identity or access credentials
- Submit false hours
- Falsify timesheets
- Create false expenses
- Manipulate payroll, CIS or agency-payment information
- Knowingly submit inaccurate project records.



## COMPANY & CLIENT PROPERTY

- Plant, vehicles, materials, fuel, tools, PPE, phones, laptops and other property must only be used as authorised.
- Theft, deliberate damage, unauthorised removal or misuse is prohibited.
- Do not remove tools, materials, scrap or waste from a workplace without permission simply because you believe they are unwanted.



## FITNESS FOR WORK

- You must attend work fit to perform your duties safely.
- You must not work while impaired by alcohol, illegal drugs or misuse of another substance.
- If medication or treatment may affect your ability to perform safety-critical duties safely, you must seek appropriate advice before undertaking those duties and follow the relevant Company procedure.

# LEGAL & ETHICAL BUSINESS CONDUCT

## RIGHT TO WORK & IDENTITY

Everyone working for, through or on behalf of Statom must have the lawful right to undertake the work for which they are engaged in the UK.

### You must:

- Provide genuine and accurate information;
- Cooperate with required checks;
- Report relevant changes to immigration or work status;
- Never alter, lend or borrow identity documents; and
- Never work using another person's identity.
- Agency workers and labour providers must cooperate with Statom's workforce-assurance requirements.
- CIS subcontractors must comply with applicable identity, Right to Work and site-access controls.

## CONFLICTS OF INTEREST

You must disclose any actual, potential or perceived conflict. This includes personal, family or financial interests involving:

- |                    |                   |
|--------------------|-------------------|
| • Clients          | • Recruitment     |
| • Suppliers        | • Procurement     |
| • Subcontractors   | • Payments        |
| • Labour providers | • Work allocation |
| • Competitors      |                   |

## MODERN SLAVERY & FAIR WORK

### Statom does not tolerate:

- forced labour;
- human trafficking;
- servitude;
- coercion;
- unlawful recruitment fees;
- document retention used as a means of control;
- unlawful child labour; or
- labour exploitation.

Report concerns such as withheld wages, threats, debt, controlled bank accounts, excessive deductions or suspicious labour-provider arrangements. Your Human Rights Policy expressly identifies these risks and provides for supply-chain due diligence and escalation.

## BRIBERY & CORRUPTION

### Never:

- offer or accept a bribe;
- offer or accept a kickback;
- make a facilitation payment;
- manipulate procurement;
- accept an improper inducement; or
- use gifts or hospitality to influence a decision.

Statom's Anti-Bribery Policy prohibits these practices.

## FRAUD & DISHONESTY

Fraud, theft, false invoices, false records, false expenses, false valuations, unauthorised purchases and deliberate misuse of Company money or assets are prohibited.

**A conflict does not automatically mean wrongdoing.**  
**Failing to disclose one may create the problem.**

# INFORMATION, TECHNOLOGY & RESPONSIBLE BUSINESS

## CONFIDENTIALITY & DATA

### Protect:

- Employee information;
- Personal data
- Payroll information
- Client information
- Drawings
- Project information
- Tenders
- Pricing
- Passwords
- Commercially sensitive information
- Statom intellectual property.

Only access information you have a legitimate need and authority to access. **Never send Company information to unauthorised personal accounts or systems.**

Statom's Data Protection and Cyber Security policies and procedures apply across HR/payroll systems, email, CCTV, mobile devices, site systems and third-party processing.

## CYBER SECURITY

### Immediately report:

- Suspicious emails
- Phishing
- Lost devices
- Unauthorised access
- Accidental disclosure
- Malware
- Suspected data breaches

**Never share passwords or intentionally bypass security controls.**

## ARTIFICIAL INTELLIGENCE

**Only use approved AI and digital tools for Company work.**

Do not enter confidential, personal, privileged or commercially sensitive information into unauthorised AI platforms.

AI-generated work must be checked before use. You are responsible for checking the accuracy, appropriateness and integrity of AI-generated work before it is used or submitted in your name.

## PHOTOGRAPHS, RECORDING & SOCIAL MEDIA

Do not photograph, film or record a Statom or client workplace unless authorised.

### Do not publish:

- confidential information;
- restricted site images;
- commercially sensitive information;
- personal information about others; or
- content that falsely represents Statom or a client.

Nothing in this section restricts lawful whistleblowing, reporting to regulators or law enforcement, or disclosures otherwise protected by law.

## ENVIRONMENT & SOCIAL RESPONSIBILITY

### We expect everyone to:

- prevent pollution;
- minimise waste;
- use resources responsibly;
- report environmental incidents;
- follow project environmental requirements; and
- support our social-value and community commitments.

Statom's CSR framework covers employment and skills, safe workplaces, community value, environmental responsibility and ethical business.

# WHAT HAPPENS IF THE CODE IS BREACHED?

The action Statom may take depends upon your employment or contractual status.

## EMPLOYEES

A breach may be addressed under the appropriate Company procedure. Serious breaches may constitute gross misconduct and may result in dismissal without notice where, following an appropriate process, that outcome is justified.

## AGENCY WORKERS

Statom may:

- investigate;
- remove or suspend access where appropriate;
- raise the matter with the supplying agency or labour provider; and
- request that the individual is removed from or does not return to a Statom assignment.

Any employment relationship between the agency worker and the supplying organisation remains a matter for that organisation.

## CIS SUBCONTRACTORS, CONSULTANTS & OTHER CONTRACTORS

Statom may, subject to the relevant contractual arrangements:

- suspend site or system access where appropriate
- require corrective action
- remove an individual from a project or assignment
- terminate the relevant engagement or contract in accordance with its terms
- decline to offer future work or engagements.



# YOUR RESPONSIBILITY/ CONCLUSION

## YOUR RESPONSIBILITY

Everyone covered by this Code is personally responsible for understanding and complying with the standards relevant to their work.

Before acting, ask:

- IS IT SAFE?
- IS IT FAIR?
- IS IT LAWFUL?
- AM I AUTHORISED TO DO IT?
- IS IT HONEST?
- WOULD I BE COMFORTABLE EXPLAINING MY DECISION TO MY MANAGER, OUR CLIENT OR THE BOARD?

## DOES IT PROTECT STATOM'S TRUST, RELIABILITY & REPUTATION?

If you are uncertain, ask. If something is wrong, speak up.

## CONCLUSION

Our reputation is built through the actions of everyone who works for, through or on behalf of Statom. We expect high standards because our work matters. Safety matters. Quality matters. How we treat people matters. Integrity matters. Doing the right thing when nobody is watching matters.

By following this Code, we protect our people, our clients, our projects and the reputation we have built together.

**TRUST** **RELIABILITY** **REPUTATION**

**ONE STANDARD ACROSS STATOM**



# STATOM GROUP



## **STATOM GROUP CODE OF CONDUCT**

Employees | Agency Workers | CIS Subcontractors | Consultants

For guidance or to raise a concern:

[hr@statom.co.uk](mailto:hr@statom.co.uk)  
[www.statom.co.uk](http://www.statom.co.uk)