



Statom Group Bullying, Harassment and Sexual Harassment Policy

HR-POL-005-06

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 is Statom Group's single operational policy for preventing and responding to bullying, harassment, sexual harassment, victimisation and relevant third-party harassment. It applies alongside the Equal Opportunities, Diversity and Inclusion Policy but avoids duplicating the wider equality framework.

2. Scope

This policy applies to employees, workers, apprentices, directors, agency workers, consultants, contractors and subcontractors, and to conduct by clients, suppliers, visitors, principal contractors and other third parties where connected with work. It covers offices, sites, travel, accommodation, training, social events, online platforms, messaging, email, calls and remote working.

3. Current legal position and October 2026 changes

At the date of this policy, employers have a proactive duty to take reasonable steps to prevent sexual harassment. From 30 October 2026, the Employment Rights Act 2025 is scheduled to require employers to take all reasonable steps to prevent sexual harassment and to introduce an obligation not to permit harassment of employees by third parties, subject to the statutory framework and available defence where the employer has taken all reasonable steps. Statom will apply the law in force at the relevant time and update risk controls as statutory guidance develops.

From 6 April 2026, a qualifying disclosure about sexual harassment may be protected under whistleblowing law. A complaint can therefore engage this policy, the Grievance Policy and, where the statutory test is met, the Whistleblowing Policy.

4. Definitions

- Bullying: offensive, intimidating, malicious, insulting, humiliating, abusive or undermining conduct, misuse of power or behaviour that unreasonably undermines dignity or wellbeing.
- Harassment: unwanted conduct related to a protected characteristic that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- Sexual harassment: unwanted conduct of a sexual nature with that purpose or effect.
- Victimisation: subjecting a person to a detriment because they have done, may do, or are believed to have done a protected act under equality law.
- Third-party harassment: harassment connected with work by a person who is not directly employed by Statom, such as a client, supplier, subcontractor, visitor or member of the public.

5. Standards of behaviour

Everyone must treat colleagues and others with dignity and respect. Banter, social events, site culture, seniority, commercial pressure or a person's intention do not excuse unacceptable conduct. Legitimate performance management, safety instruction, supervision, investigation or feedback will not normally amount to bullying where it is reasonable and carried out respectfully.

6. Prevention and risk assessment

- HR and managers will assess harassment and sexual-harassment risks and review controls.
- Risk assessment must consider sites, lone working, travel, hotels, work events, client interfaces, subcontractor interfaces, apprentices, junior workers, temporary labour, male-dominated environments and other known risk factors.
- Managers will set expectations with third parties and intervene when conduct falls below Statom standards.
- Training will be proportionate to role and risk, with enhanced training for managers and complaint handlers.
- The Group will review complaints, near misses, exit feedback and culture indicators to identify recurring risks.

7. Reporting options

A person may raise a concern with their line manager, another manager, HR or the Chief People Officer. They do not have to confront the person complained about before reporting. Where safe and appropriate, an informal resolution may be considered, but serious complaints, sexual harassment, repeated conduct, abuse of authority, retaliation or third-party risk may require formal action.

8. Formal complaints and investigation

Formal complaints of bullying, harassment, sexual harassment or victimisation will be managed under this policy. Statom will apply the procedural safeguards in the Grievance Policy where relevant, including a fair investigation, meeting, written outcome and appeal. Where a complaint also contains wider grievance issues, HR may coordinate linked processes to avoid duplication. Statom will appoint an appropriate investigator, define the allegations, gather relevant evidence, give the respondent a fair opportunity to respond, and maintain confidentiality so far as reasonably possible. The standard of proof in an internal employment investigation is the balance of probabilities.

9. Interim measures

The Company may implement proportionate interim measures to protect people or evidence while a matter is investigated. Measures may include changes to reporting lines, work location, shifts, contact arrangements, supervision, site access or temporary suspension where justified. Interim action is not a disciplinary sanction and must not unreasonably disadvantage the complainant.

10. Third-party incidents

Managers must escalate third-party harassment promptly. Depending on the circumstances, Statom may challenge the behaviour, involve the third party's employer, remove access, adjust working arrangements, escalate to the client or principal contractor, terminate a commercial relationship, or report serious matters to the police or another authority where appropriate.

11. Outcomes and disciplinary action

Where an allegation is substantiated, action may include management instruction, training, mediation where appropriate, formal disciplinary action up to and including dismissal, or termination/restriction of a contractor or third-party relationship. Employees will not be disciplined merely because a complaint is not substantiated. Knowingly false or malicious allegations may be dealt with separately.

12. Protection from retaliation

Retaliation, intimidation or disadvantage because someone raised a concern, supported another person or participated in an investigation is prohibited. Any suspected retaliation should be reported immediately to HR and may itself result in disciplinary action.

13. Confidentiality and records

Information will be shared only where reasonably necessary for investigation, decision-making, legal compliance, safeguarding, safety or support. Records will be retained in accordance with the Data Protection Policy and retention schedule. Absolute confidentiality cannot be guaranteed where the Company must investigate or act.

14. Support

HR may signpost affected employees to the Employee Assistance Programme, Occupational Health, counselling, trade union representation, a companion or other appropriate support. Reasonable adjustments will be considered where applicable.

Approval and Review

This document will be reviewed at least annually and earlier where legislation, statutory guidance, case law, Company structure, operational risk or business practice changes materially. Substantive amendments require appropriate Group approval before issue.

AUTHORISED AND APPROVED

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

*Review: Annually or earlier where legislation, guidance, Company practice or operational requirements change.
This policy is subject to annual review and approval by the Board.*