



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", "us", "our").

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 safety, quality, effective collaboration and our reputation as a trusted industry leader.

Everyone working for or on behalf of the Company must act with professionalism, respect and responsibility, follow Company policies and lawful instructions, and raise concerns promptly where safety, wellbeing, integrity, data or legal compliance may be at risk.

1. Purpose

This policy explains how employees may raise workplace concerns and how Statom will deal with grievances fairly, consistently and without unreasonable delay. It supports early resolution where appropriate and a formal process where informal action is unsuitable or unsuccessful. The policy is non-contractual.

2. Scope

This policy applies to employees. Statom may use an adapted process for workers, apprentices, agency workers, consultants or contractors where appropriate to status and circumstances. It covers concerns about treatment, management decisions, pay, working arrangements, equality, reasonable adjustments, bullying, harassment, sexual harassment, health and safety and application of Company policies.

3. Legal framework

- Acas Code of Practice on Disciplinary and Grievance Procedures.
- Employment Rights Act 1996 and Employment Relations Act 1999.
- Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023.
- Public Interest Disclosure Act 1998 and Employment Rights Act 2025 whistleblowing protections, including sexual-harassment disclosures from 6 April 2026.
- Trade Union and Labour Relations (Consolidation) Act 1992, including the statutory right to be accompanied.
- UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.

4. Core principles

- Act promptly, impartially and without unlawful discrimination or retaliation.
- Use informal resolution only where appropriate and safe; it is not a prerequisite for serious concerns.
- Give the employee a reasonable opportunity to explain the grievance and provide evidence.
- Make reasonable adjustments for disabled employees and consider communication or wellbeing needs.
- Keep information confidential so far as reasonably practicable and share only where necessary.
- Do not allow a grievance process to obstruct a protected disclosure, safeguarding report, data rights request or urgent health and safety action.

5. Informal resolution

Where appropriate, an employee may raise a concern with their line manager or another suitable manager. Possible outcomes include clarification, management action, mediation, an apology, training, changed arrangements or agreed communication steps. Informal resolution will not normally be required for serious harassment, sexual harassment, discrimination, victimisation, whistleblowing, safeguarding or safety concerns.

6. Formal grievance

The employee should submit the grievance in writing to their line manager, HR, the Chief People Officer or another appropriate senior manager. Where the employee has difficulty putting the grievance in writing, Statom will provide reasonable assistance.

- Set out the concern, relevant dates and people involved.

- Identify relevant witnesses or documents where known.
- Explain any steps already taken and the outcome sought.
- Identify any immediate support, confidentiality or adjustment needs.

7. Initial assessment and investigation

HR or the appointed manager will acknowledge the grievance promptly, assess whether urgent controls are required and decide what investigation is reasonable and proportionate. Evidence may include documents, emails, messages, HR records, site records, CCTV, system data and witness evidence where lawful and relevant. Evidence must be preserved and handled in line with data protection and privilege requirements.

8. Grievance meeting and accompaniment

Statom will arrange a grievance meeting without unreasonable delay. Employees and eligible workers have the statutory right to be accompanied by a fellow worker, trade union representative or trade union official. If the chosen companion cannot attend, the employee may propose a reasonable alternative time within five working days of the original meeting date.

9. Outcome

The Company will confirm the outcome in writing as soon as reasonably practicable. The outcome will explain the conclusions, any action Statom can disclose, and the right of appeal. The Company may be unable to disclose confidential disciplinary or personal information about another individual.

10. Appeal

An employee may appeal in writing within seven calendar days of the outcome, unless a longer period is agreed. The appeal should identify the grounds, for example procedural unfairness, material new evidence or an unreasonable conclusion. Where possible, a manager not previously involved will hear the appeal. The appeal outcome will normally be final.

11. Linked procedures

- Whistleblowing concerns will be handled under the Whistleblowing Policy where the public-interest legal test may be engaged.
- Bullying, harassment, sexual harassment and victimisation complaints will normally be handled under HR-POL-005-06 – Bullying, Harassment and Sexual Harassment Policy. Discrimination concerns that do not primarily concern harassment may be handled under this Grievance Policy with HR-POL-008-05 – Equal Opportunities, Diversity and Inclusion Policy. HR may coordinate linked processes where the facts overlap.
- A SAR/DSAR or data protection complaint must be referred immediately to the Data Protection Lead and handled under the relevant data protection procedure.
- A grievance raised during disciplinary action may be addressed separately, concurrently or by pausing the disciplinary process where fair and appropriate.
- Collective concerns may require a separate collective process.

12. Time limits and external rights

Using this procedure does not extend statutory time limits for Employment Tribunal claims or other legal action. Employees are responsible for protecting their own legal time limits. From 1 October 2026, the general Employment Tribunal claim time limit is scheduled to increase to six months for relevant claims, subject to the applicable legislation and Acas Early Conciliation rules.

13. Records, confidentiality and non-retaliation

Records will be retained in line with the Data Protection Policy and retention schedule. Retaliation, victimisation, witness interference, evidence deletion or deliberate concealment may result in disciplinary action. A complaint made in good faith will not become misconduct merely because it is not upheld.

Authorisation and review

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.*