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.

*This version absorbs the speak-up/reporting function previously contained in HR-POL-023-03.*

## 1. Purpose

This policy provides the protected internal reporting route for suspected wrongdoing in the public interest. It also absorbs the reporting function previously contained in the Malpractice and Maladministration Policy, which should be retired from the policy register.

## 2. Scope

This policy applies to workers and other persons covered by whistleblowing law and to any person whom Statom permits to use its internal speak-up routes. It is distinct from a personal grievance, although the same facts may sometimes engage both procedures.

## 3. Protected disclosures

A disclosure may qualify for statutory protection where the worker reasonably believes it tends to show one or more categories of wrongdoing and the disclosure is made in the public interest. Relevant categories include criminal offences, breach of legal obligations, miscarriages of justice, danger to health and safety, environmental damage, sexual harassment and deliberate concealment of information about wrongdoing.

## 4. Examples of concerns

- fraud, theft, false accounting or financial manipulation;
- bribery, corruption, tax-evasion facilitation, money laundering, sanctions breaches or other economic crime;
- serious health and safety failures or concealment of safety information;
- modern slavery, labour exploitation or human rights abuse;
- sexual harassment or systemic harassment concerns that meet the whistleblowing test;
- data protection, cyber-security or confidentiality breaches with a wider public-interest dimension;
- serious malpractice, maladministration, falsification of records, regulatory breaches or deliberate circumvention of Company controls;
- environmental wrongdoing or deliberate concealment of reportable incidents.

## 5. Matters normally handled elsewhere

A complaint about the employee’s own treatment, without a wider public-interest element, will normally be handled under the Grievance, Bullying and Harassment, Disciplinary, Equality or other relevant procedure. HR will determine the appropriate route and may run linked processes where necessary.

## 6. How to report

Concerns may be raised with the line manager, another senior manager, HR, the Chief People Officer, the relevant compliance lead or any designated whistleblowing contact. Where the concern involves a normal

reporting contact, the worker may bypass that person. Reports may be made verbally or in writing. Anonymous reports will be considered, although anonymity can limit investigation and feedback.

## 7. Handling and investigation

The recipient will assess the concern promptly, preserve relevant evidence and decide who should investigate. The investigator must be sufficiently independent and competent. The Company may involve Legal, Finance, SHEQ, Data Protection, external advisers, auditors, law enforcement or regulators where justified. Investigations must be proportionate and fair.

## 8. Confidentiality

The identity of a whistleblower will be protected so far as reasonably possible, but absolute confidentiality cannot be promised where disclosure is required by law, necessary for a fair investigation, or essential to protect people or evidence. Information will be shared on a need-to-know basis.

## 9. Protection from detriment and dismissal

Statom will not tolerate retaliation against a person for making a protected disclosure or participating in a whistleblowing investigation. Managers must not subject a worker to disadvantage in allocation of work, pay, progression, treatment, redundancy, dismissal or other decisions because they raised a protected concern.

## 10. External disclosures

Nothing in this policy prevents a worker from making a protected disclosure to a prescribed person or another external body where the statutory conditions are met, or from reporting suspected crime to the police. Workers are encouraged to seek independent advice where unsure about the legal requirements.

## 11. Bad faith and knowingly false allegations

A worker will not be penalised because a genuinely held concern turns out to be mistaken. Knowingly making a false allegation, fabricating evidence or using the process maliciously may be dealt with under the Disciplinary Policy.

## 12. Records and governance

Statom will maintain appropriate records of whistleblowing concerns, actions, outcomes and lessons learned while protecting confidentiality. Significant themes and control weaknesses may be reported to the Board in anonymised form. Records will be retained in accordance with data protection and legal requirements.

## 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.*