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 provides a clear route for non-employment complaints about Statom services, operations or administrative decisions, and for appeals where a specific Statom process gives a right of review. It is designed to support fair, proportionate and timely resolution without duplicating specialist HR, safety, data protection or whistleblowing procedures.

2. Scope and exclusions

This policy may be used by clients, suppliers, contractors, visitors, community stakeholders and other affected parties. Employees may use it only where the matter is not more appropriately handled under a specific employment procedure.

- Employee complaints about treatment, pay, working arrangements, discrimination, bullying or harassment must normally be handled under the Grievance and relevant dignity/equality policies.
- Disciplinary, grievance and redundancy appeals must be handled under the policy that generated the decision.
- Protected disclosures must be handled under the Whistleblowing Policy.
- Data protection complaints, SARs/DSARs and rights requests must be referred to the Data Protection Lead and handled under the relevant data protection procedure.
- Safeguarding, health and safety, fraud, bribery, malpractice and emergency concerns must be escalated under the relevant specialist process.

3. Principles

- Fairness, independence and proportionality.
- No retaliation for raising a genuine concern or participating in a review.
- Reasonable adjustments and accessible communication where required.
- Confidentiality so far as reasonably practicable, without promising absolute secrecy where investigation or legal duties require disclosure.
- Clear records, evidence preservation and data protection.
- No fixed outcome deadline where complexity, legal advice, third-party evidence or safeguarding requires more time; the complainant will be kept reasonably informed.

4. Informal resolution

Where appropriate, a concern should first be raised with the relevant manager, project lead or business contact. Informal resolution may include clarification, correction, apology, practical action or referral to the correct procedure. Informal resolution is not required where the issue is serious, sensitive, urgent or involves the relevant manager.

5. Formal complaint

A formal complaint should be submitted to HR or the relevant functional owner and should, where possible, identify the issue, relevant dates, people involved, supporting evidence and the outcome sought. Statom will normally acknowledge receipt within five working days.

6. Assessment and investigation

Statom will decide the appropriate owner and whether investigation is required. The investigator or decision-maker should be sufficiently independent and free from material conflict. Relevant parties may be interviewed and records reviewed. Statom may pause or redirect the process where another policy, regulator, insurer, police investigation or legal proceeding takes priority.

7. Outcome

The complainant will receive a written outcome as soon as reasonably practicable. The response will explain the conclusion and any action Statom can appropriately disclose. Statom will not normally disclose confidential personal, disciplinary, commercial or legally privileged information about others.

8. Appeals

An appeal is a review of a decision, not automatically a complete rehearing. An appeal should normally be submitted within seven calendar days unless the original procedure specifies another period. Grounds may include a material procedural error, significant new evidence, conflict of interest or a conclusion that was not reasonably supported by the available evidence.

- Where possible, the appeal will be considered by a person not materially involved in the original decision.
- The appeal reviewer may uphold, vary, overturn or remit the decision for further consideration.
- The appeal outcome will be confirmed in writing and will normally be final under this internal process.

9. Employment appeals

Nothing in this policy replaces the appeal rights contained in the Disciplinary, Grievance or Redundancy policies. Formal disciplinary and grievance appeal hearings will continue to include the statutory right to be accompanied where applicable and will follow the Acas Code of Practice.

10. Records, confidentiality and data protection

Complaint and appeal records will be retained in line with the Data Protection Policy and retention schedule. Evidence must not be destroyed, altered or concealed once a complaint or appeal is known or reasonably anticipated.

11. Malicious or abusive conduct

A complaint will not be rejected simply because it is critical, persistent or ultimately not upheld. However, threats, harassment, knowingly false evidence, deliberate obstruction or abusive conduct may be addressed under the appropriate Company procedure.

12. Contact

General complaints may be directed to HR at hr@statom.co.uk or to the relevant Statom business contact. Urgent safety, safeguarding, fraud, bribery, cyber or data protection matters should be escalated immediately through the specialist reporting route.

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.