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 sets the mandatory governance, approval, legal and operational controls for attracting, assessing, selecting, appointing and onboarding people for Statom. It is designed to ensure that recruitment is properly authorised, cost controlled, fair, auditable and aligned with workforce requirements. It must be read with the Recruitment & Selection Procedure, which contains the detailed workflow, Vacancy/Recruitment Request Form, Workable controls, interview records, pre-start checks and onboarding templates.

2. Scope

This policy applies to permanent, fixed-term, temporary, casual and apprentice recruitment and, where Statom participates in selection or onboarding, to agency labour, CIS individuals and LTD contractor arrangements. Employment status, tax and contractual controls must be assessed separately and must not be determined by the label used for the engagement.
This policy is non-contractual and does not form part of any employee's contract of employment. The Company may amend, replace or withdraw this policy prospectively where reasonably required, subject to applicable law and the Company's governance arrangements.

3. Responsibilities

- EXCO Board: considers and approves recruitment and headcount requests submitted by the relevant Managing Director and may approve, reject, defer or require changes to a request.
- Managing Director: reviews the business need, budget, organisational structure and proposed terms; authorises supported requests; and submits them to the EXCO Board for approval.
- Hiring Manager: prepares the business case, completes the Vacancy/Recruitment Request Form accurately, provides an approved role profile and recruitment criteria, participates in a fair selection process and does not make unauthorised commitments to candidates or agencies.
- HR: controls the recruitment process, confirms approvals, manages Workable, advises on selection and employment law, controls recruitment partner use, issues offers and contracts, coordinates pre-start checks and maintains the recruitment audit trail.
- Managers and interviewers: apply objective criteria, complete required interview records promptly, protect candidate information and declare any actual or potential conflict of interest.

4. Recruitment principles

- Recruit on merit using objective, role-related evidence and documented rationale.
- Apply the Equality Act 2010 and avoid unlawful discrimination, harassment and victimisation.
- Make reasonable adjustments for disabled applicants where required.
- Use consistent, structured and proportionate assessment methods.
- Protect candidate data and maintain an auditable recruitment record.
- Complete right to work and all required pre-start checks before work begins where required by law or Company policy.
- Use approved recruitment channels, systems and recruitment partners.
- Maximise direct recruitment through Statom's recruitment software and internal recruitment capability before incurring external recruitment fees, unless an approved business reason justifies agency use.
- Do not allow operational urgency, client pressure, project mobilisation or candidate availability to bypass approval or compliance controls.

5. Vacancy approval and role definition

All recruitment must be initiated through the Company's approved Vacancy/Recruitment Request Form. The Hiring Manager must complete the form in full and submit it to the relevant Managing Director for review and written authorisation.

Where the Managing Director supports the request, the Managing Director will submit the recruitment request to the EXCO Board for approval. Recruitment must not commence until both the Managing Director and EXCO Board approvals have been obtained and recorded.

No vacancy may be advertised, released to a recruitment partner, progressed to interview, offered to a candidate or otherwise committed to until the required approvals are in place. HR will not commence or authorise recruitment activity without evidence of the required approvals.

The approved request must define, as applicable: the business reason; whether the role is replacement or additional headcount; job title and reporting line; employing entity; employment or engagement route; location and working pattern; expected hours; salary or rate range; budget and cost centre; proposed start date; travel, overtime, shift, night or weekend requirements; car or other material benefits; sponsorship requirements; and any licence, competence, qualification or safety-critical requirements.

An approved role profile, Roles and Responsibilities document or equivalent must be available before recruitment begins and should identify the relevant behavioural, technical, professional and qualification requirements for the role.

Any material change after approval, including a change to headcount, employing entity, salary or rate, contract type, location, material benefits, agency cost or sponsorship requirement, must be referred back through the appropriate approval route before an offer or commitment is made.

6. Recruitment software and direct sourcing

Workable, or any successor recruitment platform approved by Statom, is the Company's primary recruitment system and should be used as the central recruitment record. HR and Hiring Managers must maximise the functionality available through the system throughout the recruitment lifecycle.

- Approved vacancies should be created and managed through Workable.
- Direct advertising, candidate sourcing, applications, candidate communications, interview scheduling, assessment records, interview feedback, source information and recruitment status should be recorded through Workable where the functionality is available.
- Candidate information received outside Workable should be transferred into the approved recruitment system by HR as soon as reasonably practicable, subject to the applicable privacy requirements.
- Managers must not operate separate or parallel recruitment processes outside the approved system without prior HR approval.
- Statom will seek to maximise direct recruitment and use of its own recruitment software, approved advertising channels and existing candidate pipelines before using external recruitment partners, unless the role or market requires an approved alternative approach.

7. Approved recruitment partners and agencies

External recruitment agencies or recruitment partners may only be used where they are included on Statom's approved recruitment partner list or Preferred Supplier List and their terms are approved and contractually compliant with Statom requirements.

Only HR may formally release an approved vacancy to a recruitment partner or authorise agency activity on behalf of the Company, unless the Group Chief People Officer has expressly approved another arrangement in writing.

- Managers must not instruct an unapproved agency or recruitment partner.
- Managers must not agree agency terms, fees, rebates, exclusivity, candidate ownership or other contractual commitments on behalf of Statom unless expressly authorised to do so.
- Agency use must relate to an approved vacancy and remain within the authorised budget and terms.
- Unsolicited candidate introductions or CVs from unapproved agencies must be referred to HR and must not be progressed until HR has confirmed the appropriate contractual and recruitment position.
- Recruitment partners must follow Statom's equality, data protection, right to work, modern slavery, safeguarding, confidentiality and conduct requirements where applicable.

8. Advertising and candidate attraction

- Advertisements and role profiles must use objective criteria linked to genuine role requirements.
- Statom will include an equal opportunities statement and an accessible route for adjustment requests.

- Statements about employing entity, location, hybrid or site attendance, working hours, salary or rate where stated, and significant travel requirements must be accurate and consistent with the approved vacancy.
- Vacancies may be advertised internally or externally according to business need, workforce planning and any relevant redeployment considerations.
- No advertisement may materially depart from the approved role or approved terms without HR and, where required, renewed business approval.

9. Shortlisting, interviewing and assessment

- Use agreed, role-related criteria and structured questions.
- Assess candidates consistently and record evidence, scores and selection reasons factually and professionally.
- Interview feedback and selection decisions must be recorded in Workable or the approved recruitment record as soon as reasonably practicable.
- Do not ask unlawful or irrelevant questions about pregnancy, family plans, health, disability, age, religion or belief, race, sex, sexual orientation, gender reassignment, marriage or civil partnership, or other protected characteristics.
- Health or disability questions before offer may only be asked where legally permitted, for example to arrange reasonable adjustments or assess an intrinsic function of the role.
- Assessment tools must be valid, proportionate, accessible and relevant to the role.
- Reasonable adjustments must be considered and implemented where required to provide a fair recruitment process.

10. Conflicts of interest

Anyone involved in recruitment must declare to HR any actual or potential personal, family, financial or other relationship with a candidate or recruitment partner that could reasonably be perceived to affect impartiality. HR will determine what safeguards are required, which may include changing the interviewer, adding an independent decision-maker or removing the individual from the decision.

11. Offers, pay and contractual commitments

Only HR may issue a formal offer of employment, contract of employment or other engagement documentation on behalf of Statom unless the Group Chief People Officer has expressly authorised another process. Managers must not make promises or commitments to candidates concerning salary, rate, bonus, allowances, vehicles, hybrid working, notice, start date, sponsorship or other contractual terms outside the approved arrangements. The proposed offer must remain within the terms approved through the Vacancy/Recruitment Request Form and EXCO Board approval. Any material departure must be re-approved before the offer is issued.
Verbal discussions do not replace the written offer or contract. All offers are conditional until HR confirms that the required approvals and relevant pre-start conditions have been satisfied or that any outstanding condition can lawfully remain pending.

12. Offers and pre-start checks

Depending on the role or engagement, pre-start checks may include right to work, identity, references, qualifications, licences or tickets, DBS or safeguarding checks where legally appropriate, occupational health or medical clearance where justified, insurance, CIS verification, worker status or IR35 review, client requirements, site competence and any other check required by law, contract, client or Company policy.
No person may begin work until the mandatory right to work check and any other check that must legally or operationally be completed before commencement has been completed and recorded. HR will determine which checks are mandatory for the relevant role and whether any non-mandatory condition may remain outstanding after commencement.

13. Right to work and immigration

Statom will complete legally compliant right to work checks for employees before employment begins and will apply equivalent assurance as a business control to workers, CIS individuals, LTD contractor personnel and agency-supplied labour before site or system access. Checks must follow the current Home Office-approved route and HR-POL-044-03 Right to Work Policy. Managers must not accept screenshots, informal assurances or unchecked share codes as evidence.
Any requirement for visa sponsorship must be identified during the vacancy approval process. No manager may promise sponsorship or make a sponsorship-related commitment to a candidate unless the relevant approvals have been obtained and HR has confirmed that the proposed sponsorship is lawful and operationally supportable.

14. References, qualifications and competence

References should normally be sought after a conditional offer unless HR approves another approach. They should focus on relevant factual information and be handled confidentially. Qualifications, licences, professional memberships, tickets and safety-critical competence must be verified where material to the role.
Where a material discrepancy is identified, HR will assess the issue with the Hiring Manager before any decision is taken. The candidate should normally be given an appropriate opportunity to explain information that may affect the appointment.

15. Health, medical and HSE information

Where justified by the role or Company process, an approved Medical Questionnaire, HSE form, occupational health referral or other health-related pre-employment assessment may be issued after a conditional offer. Such information must be used only for legitimate purposes such as assessing fitness for safety-critical work, identifying support or reasonable adjustments, or meeting lawful health and safety requirements.
Health and disability questions before offer may only be asked where legally permitted. Medical and health information is confidential special category personal data and must be accessed, stored and shared only by those who require it for a lawful purpose.

16. Recruitment data, privacy and AI

Candidate data must be handled under HR-POL-006-07 Data Protection, GDPR & Cyber Security Policy, the Recruitment Applicant Privacy Notice and the retention schedule. Recruitment notes must be objective, accurate and suitable for disclosure. Special category and criminal offence data must only be collected where a lawful condition and appropriate safeguards apply.
Workable or other AI or automation may support recruitment only where HR, IT and the Data Protection Lead have approved the use. Statom must assess lawful basis, transparency, bias and discrimination risk, accuracy, security, supplier controls and appropriate safeguards. Significant recruitment decisions must have meaningful human oversight unless solely automated processing is lawfully permitted and the required safeguards are in place.

17. Agency, CIS and LTD contractor controls

- Confirm the correct engagement route and do not use CIS or LTD status to avoid employment rights, PAYE or statutory obligations.
- Obtain appropriate right to work assurance for named personnel before work starts.
- Confirm insurance, competence, site and health and safety requirements.
- Complete IR35, off-payroll or employment-status assessment where applicable.
- Ensure suppliers and agencies understand and comply with Statom equality, modern slavery, safeguarding, data protection, confidentiality, right to work and conduct requirements.
- Agency labour, CIS and LTD contractor arrangements remain subject to the relevant commercial, procurement, tax and operational approval controls in addition to this policy.

18. Onboarding and probation

HR and the Hiring Manager must ensure the new starter receives the required contract or engagement documentation, onboarding information and relevant Company policies before or at commencement as appropriate. Where applicable, the employee should also receive the approved Roles and Responsibilities document, reporting line, behavioural and technical competencies and role expectations used for performance and development discussions.
For PAYE employees, probation applies only where stated contractually. Managers must set clear objectives and expectations, review performance and conduct, document concerns, provide reasonable support and consult HR before any probation extension or dismissal. Statutory day-one and other protected rights continue to apply during probation.
From 1 January 2027, the ordinary unfair dismissal qualifying period is reduced from two years to six months. Statom will apply the law in force at the date of any dismissal decision and managers must not treat probation as removing the need for a fair, evidence-based process.

19. Written particulars, working time and young workers

Required written employment particulars must be provided on or before the first day where required by law. Working hours, rest, night work, young-worker restrictions, visa conditions, apprenticeship requirements and health and safety requirements must be checked before appointment and managed under the relevant Statom policies and applicable law.

20. Records, audit and retention

Recruitment approvals, candidate records, interview evidence, selection decisions, offer approvals, pre-start checks and material recruitment correspondence must be retained in the approved system or other authorised Company record in accordance with the retention schedule.

Recruitment records will be retained only for the period justified by recruitment, legal, audit and claims requirements. Unsuccessful candidates will not be placed in a talent pool without an appropriate lawful basis and clear privacy information.

HR may audit recruitment activity, Workable records, agency use, approval evidence and onboarding compliance. Managers and business units must provide information reasonably required for audit, legal, payroll, client or governance purposes.

21. Non-compliance and exceptions

No manager has authority to bypass this policy because a vacancy is urgent or a candidate is at risk of being lost. HR may pause recruitment, withdraw an unauthorised offer from approval, refuse to instruct an agency or escalate non-compliance to the relevant Managing Director, Group Chief People Officer or EXCO Board.

Any exception to this policy must be approved in writing by the Group Chief People Officer and, where the exception changes an approved headcount, budget or material employment term, by the appropriate Managing Director and EXCO Board. Failure to follow mandatory recruitment controls may be addressed under the relevant Company procedures.

22. Related documents

- Recruitment & Selection Procedure and Vacancy/Recruitment Request Form
- Right to Work Policy (HR-POL-044-03)
- Equal Opportunities, Diversity and Inclusion Policy (HR-POL-008-05)
- Data Protection, GDPR & Cyber Security Policy (HR-POL-006-07) and Recruitment Applicant Privacy Notice
- Learning and Development Policy
- Flexible Working Policy
- Modern Slavery Policy
- Disciplinary Policy and probation review templates
- Relevant Health and Safety, safeguarding, immigration/sponsorship, procurement and engagement-status procedures where applicable

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.