Statom Group Modern Slavery and Human Trafficking Policy HR-POL-026-04

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 policy sets out Statom Group's approach to preventing, identifying and responding to modern slavery and human trafficking in our business and supply chains. It supports compliance with the Modern Slavery Act 2015 and the Group's annual transparency statement obligations.

2. Scope

This policy applies to employees, directors, workers, agency workers, consultants, contractors, subcontractors, labour providers, suppliers and other business partners working for or on behalf of Statom Group.

3. What modern slavery includes

- slavery, servitude and forced or compulsory labour;
- human trafficking;
- debt bondage, coercion, threats or restriction of movement;
- withholding identity documents or wages, unlawful recruitment fees or deductions;
- labour exploitation, including excessive hours, underpayment or abuse of vulnerable workers;
- child labour or other exploitation prohibited by law.

4. Policy commitment

Statom Group has zero tolerance for modern slavery. We will act ethically and with integrity, assess risk, apply proportionate prevention controls, investigate concerns promptly and prioritise the safety and wellbeing of affected people. We will not knowingly enter into or continue a business relationship where serious modern slavery risk is ignored or inadequately addressed.

5. Governance and responsibilities

Role	Responsibility
Board / Senior Management	Oversight, resources, annual statement approval and accountability.
Chief People Officer / HR	Worker protection, recruitment controls, reporting routes, remediation support and training.
Procurement / Commercial	Supplier risk assessment, due diligence, contractual controls, audit and corrective action.
Managers / Site Teams	Site-level vigilance, labour-provider checks, escalation and protection of workers.
Employees / Contractors	Follow the policy and report concerns immediately.

6. Risk assessment

Risk assessments will consider labour model, subcontracting tiers, recruitment channels, geography, materials or commodity risk, use of migrant or temporary labour, payment practices, accommodation, working hours,

document retention, recruitment fees and previous concerns. Higher-risk suppliers, projects or labour arrangements will receive enhanced due diligence and monitoring.

7. Recruitment and labour supply controls

- Workers must not be charged recruitment fees by or on behalf of Statom.
- Right-to-work checks must be completed lawfully without retaining original identity documents beyond what is necessary for the check.
- Pay, deductions and hours must be lawful and transparent.
- Labour providers and subcontractors must not prevent workers from leaving employment or freely retaining their own identity documents and bank cards.
- Concerns about wage withholding, coercion, accommodation, transport debt or unusual control by an intermediary must be escalated.

8. Supplier due diligence and contracts

Supplier and subcontractor due diligence will be proportionate to risk and may include questionnaires, ownership and labour-model checks, modern slavery statements, policies, recruitment practices, audit evidence, site checks, worker interviews and contractual commitments. Contracts may require compliance with law, cooperation with audits, notification of incidents and corrective action.

9. Reporting concerns

Concerns may be raised with a manager, HR, Procurement, a Director or through the Company's confidential Whistleblowing route. No person will suffer retaliation for raising a genuine concern in good faith. If anyone is in immediate danger, the emergency services must be contacted first.

10. Response and remediation

The Company will not treat termination of a supplier as the only response. Where safe and appropriate, we will take a victim-centred approach, preserve evidence, protect affected individuals, obtain specialist advice, cooperate with competent authorities, require corrective action and consider commercial sanctions. Action will be proportionate to the severity and credibility of the concern.

11. Training and awareness

Relevant HR, procurement, commercial, recruitment, site and management roles will receive modern slavery awareness proportionate to their responsibilities. Training will cover warning signs, reporting routes, labour-supply risks and appropriate escalation.

12. Annual transparency statement

Where section 54 of the Modern Slavery Act 2015 applies, Statom will prepare an annual modern slavery statement describing the steps taken during the relevant financial year. The statement will be approved at the appropriate Board level, signed by a director and published in accordance with current statutory requirements and Home Office guidance.

13. Records, monitoring and continuous improvement

The Group will keep proportionate records of risk assessments, due diligence, training, reports, investigations, corrective actions and supplier engagement. Lessons learned will inform the annual statement and future controls.

14. Related policies

- Whistleblowing Policy
- Supplier Code of Conduct
- Safeguarding Policy
- Anti-Bribery and Anti-Corruption Policy
- Data Protection Policy
- Recruitment and Right to Work procedures
- Disciplinary Policy

15. Review

This policy will be reviewed annually and sooner where legislation, Home Office guidance, procurement requirements or supply-chain risk changes.

AUTHORISED AND SIGNED

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.