



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 Statom's mandatory controls for checking and maintaining evidence of the right to work in the UK. It is designed to prevent illegal working, preserve any available statutory excuse against a civil penalty and ensure checks are applied consistently without unlawful discrimination.

2. Scope

The statutory right to work checking regime applies to employees. As a Company control, Statom also requires appropriate right to work assurance before CIS individuals, agency-supplied workers, LTD contractor personnel, substitutes or other site personnel begin work or access Company systems, even where Statom is not their legal employer.

3. Ownership and control

- HR/People owns the right to work process, evidence standards, follow-up diary and escalation.
- Hiring managers and site teams must not allow a person to start work, attend site, undertake productive trial work or access Company systems until HR confirms the required check/assurance is complete.
- Payroll must not treat payroll setup as proof that a right to work check has been completed.
- Operational urgency, client pressure or labour shortages do not override this control.

4. Timing

A prescribed right to work check must be completed before employment begins in order to establish the statutory excuse. Time-limited permissions must be followed up at the point required by current Home Office guidance. Changes to role, hours, location or duties for sponsored or restricted workers must be referred to HR before implementation.

5. Approved check routes

HR must use the Home Office-approved route that applies to the individual. Depending on status, this may include:

- Home Office online right to work service using a valid share code for individuals whose status is evidenced digitally, including eVisa holders;
- manual check of original acceptable documents where the current Home Office rules permit a manual route;
- an approved Identity Service Provider / digital identity verification route for eligible British and Irish citizens where Statom elects to use that route; or
- Home Office Employer Checking Service where required, including obtaining a Positive Verification Notice where the guidance permits this to establish a time-limited statutory excuse.

Expired physical Biometric Residence Permits must not be accepted as standalone evidence of right to work. HR must follow the current Home Office guidance in force on the date of the check and should not rely on an old printed document list where the official guidance has changed.

6. Conducting the check

- Confirm the person presenting the evidence is the person to whom it relates.

- Check photographs, biographical information, permission, expiry dates and any restrictions relevant to the proposed work.
- For online checks, use the employer service and retain the employer-facing profile showing the photograph, status and date of check.
- For manual checks, inspect original documents in the individual's presence, physically or by a method permitted by current Home Office guidance, and make the required clear copy/record.
- Record the date the check was made and the checker's identity in a format that cannot be altered without an audit trail.

7. Record retention

Evidence establishing the statutory excuse must be retained securely for the duration of employment and for two years after employment ends, or for the period required by current Home Office guidance if this changes. Access must be restricted in accordance with the Data Protection Policy and Employee Privacy Notice.

8. Time-limited permission and follow-up

HR must record expiry/follow-up dates and conduct repeat checks where required. Employees must cooperate and provide share codes, evidence or information reasonably required. If an application, appeal or administrative review is pending, HR must use the Employer Checking Service where appropriate rather than assuming permission continues.

9. Sponsored workers and restrictions

- Check role, occupation, hours and any other conditions relevant to the individual's permission.
- Do not agree changes that may breach sponsorship or immigration conditions without HR review.
- Maintain sponsor-compliance records and report changes where required if Statom holds a sponsor licence.
- For students or others with hours restrictions, obtain and retain the additional evidence required by current guidance, including relevant term/vacation information where applicable.

10. Agencies, contractors and labour providers

Contracts with labour providers should require lawful right to work checks and audit cooperation. Statom must obtain suitable assurance before access is granted and may request direct evidence or conduct its own check where appropriate for risk, client, sponsor or audit reasons. Where another partner performs checks, HR must record who completed the check and the evidence of assurance.

11. Equality and anti-discrimination

Checks must be applied consistently to all prospective employees at the same appropriate stage, regardless of nationality, race, accent, name, appearance or perceived immigration status. Managers must not insist on a British passport or treat a person less favourably because they use an online status, eVisa, Employer Checking Service or another lawful route.

12. Failure, expiry or loss of permission

If satisfactory evidence cannot be obtained before the proposed start date, Statom may delay or withdraw the offer. If an existing employee appears to lose permission, fails a follow-up check or becomes subject to a restriction, HR must assess the facts, obtain appropriate Home Office verification where available and follow a fair process before dismissal or other action. Suspension or removal from work may be used where necessary to avoid illegal working or safety/regulatory risk.

13. False documents and fraud

Suspected false documents, identity fraud, misuse of status or deliberate misrepresentation must be escalated immediately to HR and may result in withdrawal of offer, disciplinary/contractual action and referral to the Home Office, police or another authority where appropriate. Managers must not make their own forensic determination where specialist verification is required.

14. Legal risk

Employing a person illegally without a statutory excuse can result in a civil penalty of up to £60,000 per illegal worker, together with wider criminal, director, sponsor-licence and reputational consequences. Statom will therefore maintain auditable checks and follow current Home Office employer guidance.

15. Related policies

- Recruitment Policy and Recruitment & Selection Procedure
- Data Protection, GDPR & Cyber Security Policy
- Access to Personal Data Policy
- Disciplinary Policy
- Equal Opportunities, Diversity and Inclusion Policy
- Modern Slavery and Human Trafficking Policy
- Contractor onboarding and sponsor-compliance procedures

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.*