



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 and Commitment

Statom Group is committed to respecting internationally recognised human rights throughout its operations and business relationships. Our approach is informed by UK law, the UN Guiding Principles on Business and Human Rights, relevant International Labour Organization principles and our obligations relating to equality, modern slavery, health and safety, employment and procurement.

2. Scope

This policy applies to all Group companies, directors, employees, workers, contractors and business activities. Statom expects suppliers, subcontractors, labour providers, consultants, joint venture partners and other business partners to uphold equivalent standards and to cooperate with proportionate due diligence and remediation.

3. Core Human Rights Standards

- Dignity and equality: no discrimination, harassment, sexual harassment, victimisation, violence, degrading treatment or retaliation.
- No forced labour, trafficking, servitude, debt bondage, withholding of identity documents or coercive recruitment practices.
- No unlawful child labour. Young people may work only within applicable age, education, working-time, safeguarding and health and safety protections.
- Fair work: lawful pay, working time, rest, leave, safe conditions, freedom from unlawful deductions and access to contractual/statutory rights.
- Freedom of association and collective bargaining in accordance with applicable law.
- Respect for privacy, personal data and confidentiality.
- Safe and healthy working conditions, including physical and psychological health.
- Respect for the rights of migrant workers and other individuals who may be at heightened risk of exploitation.

4. Recruitment Fees and Worker Documents

Workers must not be charged unlawful recruitment fees or required to pay for access to work. Statom will not knowingly retain passports, immigration documents or identity documents as a means of control. Any verification copies must be handled in accordance with Right to Work and Data Protection requirements.

5. Supply Chain Due Diligence

Risk-based due diligence may include supplier questionnaires, contractual clauses, right-to-work and labour-provider assurance, modern slavery checks, site audits, worker interviews, payroll/CIS evidence, adverse information checks and corrective action plans. Higher-risk issues will be escalated to Procurement, HR, SHEQ and/or Legal/Compliance.

6. Speak-Up and Remedy

Workers and stakeholders may raise human-rights concerns through management, HR, the Whistleblowing Policy or other available channels. Reports will be handled without retaliation. Where Statom identifies that it caused or contributed to an adverse human-rights impact, it will seek proportionate remediation and prevention of recurrence. Where the impact is directly linked through a business relationship, Statom will use appropriate leverage.

7. Modern Slavery and Exploitation

This policy complements the Modern Slavery and Human Trafficking Policy and annual Modern Slavery Statement. Indicators such as restricted movement, threats, withheld wages, debt, excessive deductions, controlled bank accounts, document retention, overcrowded accommodation or unexplained labour-provider arrangements must be reported immediately.

8. Governance, Monitoring and Training

The Board retains overall oversight. HR, SHEQ, Procurement and business leaders are responsible for embedding controls within their areas. Relevant personnel will receive training. Material risks, incidents, audit findings and corrective actions will be reviewed and recorded.

9. Related Policies

Related policies include Modern Slavery and Human Trafficking, Equal Opportunities, Diversity and Inclusion, Bullying, Harassment and Sexual Harassment, Whistleblowing, Young People at Work, Right to Work, Health and Safety, Anti-Bribery, Anti-Fraud, Recruitment, Data Protection and Contractor Code of Conduct.

Approval and Review

This policy will be reviewed at least annually and earlier where legislation, regulatory 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.*