



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. Policy Statement

Statom is committed to fair, proportionate and lawful recruitment. A criminal record will not automatically prevent employment or engagement. Decisions will be based on the role, the legally disclosable information, the nature and relevance of any offence, risk, evidence of rehabilitation and the individual circumstances.

2. Scope

This policy applies to job applicants and employees where criminal-record information is relevant to recruitment, continued employment, client/site requirements or a role legally eligible for a DBS check.

3. Rehabilitation of Offenders Act 1974

For roles that are not exempt from the Rehabilitation of Offenders Act 1974, Statom will not ask applicants to disclose spent convictions or cautions and will not take account of information the law treats as spent. Rehabilitation periods depend on the sentence/disposal and the person's age at conviction. HR must use current official DBS/GOV.UK guidance rather than relying on a static table in this policy.

As at this review, common adult rehabilitation periods include: custodial sentences over 4 years (where eligible for rehabilitation) become spent 7 years after the sentence including licence is completed; sentences over 1 year and up to 4 years, 4 years after completion; sentences of 1 year or less, 12 months after completion; fines, 12 months from conviction; simple cautions are spent immediately. Certain sentences/offences are excluded from rehabilitation and remain disclosable. Different periods apply where the person was under 18.

4. DBS Eligibility and Level of Check

A DBS check will only be requested where the role is legally eligible for that level of check. Statom will not request a Standard or Enhanced DBS check merely because a client would prefer one. HR must confirm the legal eligibility, workforce category and barred-list entitlement before a check is commissioned.

5. Spent Convictions, Filtering and Protected Information

Even for exempt roles, some old/minor convictions and cautions are protected by DBS filtering rules and must not be requested or considered. Applicants will be told what information they are legally required to disclose and the level/type of check being undertaken.

6. Assessment of Disclosed Information

- the nature, seriousness and relevance of the offence to the duties and risks of the role;
- the circumstances and age at the time;
- time elapsed and evidence of rehabilitation;
- pattern or frequency of offending;

- access to money, systems, vulnerable people, sensitive sites, driving, plant, security or positions of trust;
- the accuracy and context of the information and any explanation offered by the individual; and
- whether reasonable safeguards can manage the identified risk.

Before withdrawing an offer or taking adverse action based on a disclosure, Statom will normally give the individual an opportunity to explain the information and will document the rationale for the decision.

7. Failure to Disclose

Action will only be considered where the individual was lawfully required and clearly asked to disclose the information and the omission was material. No action will be taken for failure to disclose spent or protected information that the individual was not legally required to reveal.

8. Data Protection

Criminal-offence data will be processed only where Statom has a lawful basis and meets the additional Data Protection Act 2018 condition requirements. Access will be restricted. DBS certificate information and recruitment records will be retained and destroyed in accordance with the Data Protection Policy, Employee/Candidate Privacy Notice, DBS Code of Practice and Group retention schedule.

9. Equality, Client Requirements and Existing Employees

Decisions must be consistent, evidence-based and non-discriminatory. A client or site requirement does not remove Statom's duty to verify that a check or exclusion is lawful and proportionate. Any new criminal matter affecting an existing employee will be considered under the relevant employment, safeguarding, security and disciplinary procedures rather than treated as automatic grounds for dismissal.

10. Related Policies

This policy should be read with Recruitment, Right to Work, Data Protection, Safeguarding, Equality, Disciplinary, Whistleblowing and Contractor Code of Conduct requirements.

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.*