



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 a consistent and legally compliant approach to employment references for current and former employees and workers. It protects individuals, the Company and prospective employers by ensuring references are authorised, accurate, fair, secure and appropriately documented.

2. Scope

This policy applies to all Group Companies and to anyone asked to provide, verify or process a reference on behalf of the Company.

3. General position

The Company is not generally required to provide an employment reference unless a contractual, settlement, regulatory or other legal obligation applies. Where the Company provides a reference, it must be fair, accurate, not misleading and capable of being supported by records.

4. Authorisation

- All employment references must be issued through HR or another person expressly authorised in writing by HR.
- Managers and employees must not provide references on Company letterhead or from a Company email account unless authorised.
- A personal or character reference must make clear that it is given in a personal capacity and not on behalf of Statom Group.

5. Verification of requests

Before releasing information, the Company will take reasonable steps to verify the identity of the requester and the legitimacy of the request. Where the request is made by a third party, HR may seek evidence that the individual expects or has authorised the reference request. Consent is not treated as the only possible lawful basis for processing personal data; HR will apply the appropriate lawful basis and the Employee Privacy Notice.

6. Standard factual references

Unless a Director and HR approve otherwise, the Company will provide a factual reference. This will normally be limited to:

- employment start and end dates
- job title or titles held
- employment status where relevant
- a brief factual description of duties where requested and appropriate

Salary, absence, disciplinary, performance, reason for leaving or other potentially adverse information will not be included in a standard reference unless there is a clear lawful and business reason, the information is accurate and supportable, and HR has approved the wording.

7. Detailed or regulatory references

Where a regulatory regime, contractual commitment or settlement agreement requires a particular form of reference, the Company will follow that requirement. HR must review any reference containing performance, conduct, safeguarding, financial services or other material risk information before issue.

8. Accuracy, fairness and discrimination

References must distinguish fact from opinion, avoid speculation and reflect material context where omission would make the reference misleading. The Company will not provide a discriminatory, retaliatory, malicious or knowingly inaccurate reference.

9. Confidentiality and data protection

References and reference requests are personal data and must be handled in line with the Data Protection Policy, Employee Privacy Notice and applicable data protection law, including the Data Protection Act 2018 and UK GDPR as amended by the Data (Use and Access) Act 2025. The Company will normally mark employment references as confidential.

10. Subject access requests

A subject access request may be made verbally or in writing and must be referred immediately to the Privacy / Data Protection team. Confidential employment references may be exempt from the right of access where the statutory exemption applies. The Company will assess any exemption case by case and will not give assurances that a reference will automatically be disclosed or withheld.

11. Record keeping

HR will keep an appropriate record of references issued and the supporting request in accordance with the Group retention schedule. Reference information must not be retained for longer than necessary.

12. Related policies

- Data Protection, GDPR & Cyber Security Policy
- Employee Privacy Notice
- Records Retention Schedule
- Equal Opportunities, Diversity and Inclusion Policy
- Whistleblowing Policy
- Disciplinary Policy

13. Review

The Group Chief People Officer will review this policy annually or sooner where legal, regulatory or operational requirements change.

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.*