



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

The purpose of this policy is to ensure a safe, respectful, and inclusive environment for all employees, students, contractors, volunteers and members of Statom Group. This policy outlines expectations for behaviour, the procedures for reporting and addressing bullying, harassment and sexual harassment and the consequences of violating this policy.

2. Scope

This policy applies to all employees, workers, contractors, subcontractors, volunteers and any other individuals associated with Statom Group, whether on or off the premises, including online activities.

Definitions of Bullying, Harassment, and Sexual Harassment

Bullying: Repeated, unreasonable behaviour directed towards an individual or group that poses a risk to health and safety. Bullying can be physical, verbal, or psychological and may include actions such as spreading rumours, intimidating behaviour, and social exclusion.

Harassment: Unwanted behaviour related to a protected characteristic (e.g., age, sex, race, disability, religion) that violates an individual's dignity or creates an intimidating, hostile, degrading, or offensive environment. Harassment can be verbal, non-verbal, or physical.

Sexual Harassment: Any unwanted or inappropriate behaviour of a sexual nature that creates a hostile or intimidating environment. This may include, but is not limited to, unwelcome sexual advances, requests for sexual favours, inappropriate comments, gestures, or physical contact. Sexual harassment can occur between colleagues, students, or any individuals in the workplace or organisational setting.

Examples include, but are not limited to:

- Verbal abuse or insults
- Unwanted physical contact
- Spreading malicious rumours
- Intimidation or threats
- Humiliating or belittling comments

- Exclusion from activities or groups
- Cyberbullying or online harassment

Sexual Harassment:

- Unwanted sexual advances
- Inappropriate comments, jokes, or gestures of a sexual nature
- Unwanted physical contact or sexual behaviour
- Displaying or sharing explicit materials
- Making sexually suggestive remarks or innuendos
- Requesting sexual favours in exchange for benefits or promotions

3. Reporting Procedures

How to Report: Individuals who believe they have been subjected to bullying, harassment, or sexual harassment should report the incident to their supervisor, HR department, or a designated representative as soon as possible.

Confidentiality: All reports will be treated with the highest level of confidentiality, and information will only be shared on a need-to-know basis.

No Retaliation: Statom Group strictly prohibits retaliation against anyone who reports bullying, harassment, or sexual harassment in good faith.

4. Investigation Process

Initiation: Upon receiving a report, Statom Group will promptly initiate an investigation. This may include interviews with the complainant, the alleged perpetrator, and any witnesses.

Impartiality: The investigation will be conducted impartially and thoroughly, with a written report summarising the findings.

Outcome: The outcome of the investigation will be communicated to the involved parties, along with any corrective actions to be taken.

5. Consequences of Policy Violations

Individuals found to have engaged in bullying, harassment, or sexual harassment may face disciplinary actions, up to and including termination of employment or expulsion. In some cases, legal action may be pursued if the behaviour violates local, regional or UK laws.

Support for Affected Individuals

Statom Group will provide support to individuals who have experienced bullying, harassment, or sexual harassment. This may include mediation, counselling, or other appropriate resources to assist individuals in recovering from the effects of such behaviour.

Grievance Procedures

Informal Stage: Employees are encouraged to first attempt to resolve issues informally by discussing them with their line manager. If the grievance involves the line manager, the issue should be raised with Human Resources.

Formal Stage:

Written Grievance: If the issue cannot be resolved informally, the employee must submit a formal written grievance within 14 days. This document should detail the nature of the complaint and be sent to Human Resources.

Hearing: A formal hearing will be arranged within seven days of receiving the grievance. A work colleague may accompany the employee. The outcome of the hearing will be communicated in writing within seven days.

6. Appeal Stage

Filing an Appeal: If the employee is dissatisfied with the hearing's outcome, they can submit a written appeal within seven days of receiving the decision. The appeal should explain the grounds for contesting the decision.

Appeal Hearing: The appeal hearing will be conducted similarly to the initial hearing, with the employee having the right to be accompanied. The result of the appeal will be provided in writing within seven days.

Training and Awareness

Statom Group is committed to educating all members of the organisation on the importance of this policy through regular training sessions, workshops, and communication campaigns. This will include awareness on recognising and preventing bullying, harassment, and sexual harassment.

Review and Monitoring

This policy will be reviewed annually to ensure it remains relevant and effective. Necessary updates will be made, and the revised policy will be communicated to all members of the organisation.

12. Contact Information

For more information or to report an incident, please contact: **Martina Oyite at 07703 808 121 or martina.oyite@statom.co.uk**

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

This policy is subject to annual review and approval by the Board.