STATOM GROUP

Modern Slavery and Human Trafficking Statement

Financial year ended: 31 December 2026

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps Statom Group has taken during the financial year ended 31 December 2026 to prevent modern slavery and human trafficking in our business and supply chains.

1. Our commitment

Statom Group is committed to acting ethically and with integrity in all business relationships.

We take a zero-tolerance approach to modern slavery and human trafficking, including slavery, servitude, forced or compulsory labour, and human trafficking.

We aim to prevent modern slavery by assessing risk, implementing proportionate controls, and taking action where concerns arise.

We support a culture where people feel safe to speak up.

2. Our business and structure

Statom Group is a UK construction group providing specialist solutions across civil engineering, demolition, remediation, groundwork, piling and RC frames.

This statement covers our UK operations and the entities directly controlled by Statom Group.

Our supply chain includes labour providers, subcontractors, plant and equipment providers, materials suppliers, and professional services.

3. Our supply chain and risk profile

We recognise that modern slavery risks can arise in construction through:

- labour exploitation via subcontracting and labour agencies
- underpayment, unlawful deductions, and excessive working hours
- coercion and intimidation of workers
- upstream risks in materials supply chains, including imported materials

Risk varies by labour model, geography, commodity or material category, and the extent of subcontracting.

4. Policies and governance

We maintain policies and controls designed to prevent and identify modern slavery risks, including:

- Modern Slavery Policy
- Whistleblowing Policy, including confidential reporting channels
- Supplier Code of Conduct and ethical sourcing expectations
- relevant HR and procurement controls to support fair recruitment and lawful engagement
- Oversight sits with senior leadership, with delivery owned across procurement, HR, and operational teams.

5. Due diligence and risk management

We apply a risk-based approach to supplier due diligence and monitoring as far as is practical. This includes, where proportionate:

- supplier onboarding checks
- contractual obligations requiring compliance with law and our supplier standards
- supply chain risk assessment by supplier and category
- targeted supplier engagement and corrective actions where risk indicators arise
- site-level checks and escalation routes where labour is used on projects

6. Training and awareness

During the year, we continued awareness activity for relevant roles on:

- indicators of modern slavery and labour exploitation
- how to report concerns and escalate issues
- responsible procurement and supplier management expectations

7. Reporting and remediation

We encourage employees, supply chain partners, and workers on our sites to report concerns through management routes or confidential whistleblowing channels.

Where concerns are identified, we aim to:

- prioritise safety and wellbeing of affected individuals
- investigate promptly and fairly
- engage specialist support and notify authorities where required
- require corrective action from suppliers and take proportionate contractual action where necessary

8. Effectiveness and continuous improvement

We review the effectiveness of our controls through internal review, supplier engagement, and lessons learned.

For the next reporting period, we will continue to strengthen evidence and measurement aligned to UK expectations, including clearer reporting of:

- priority risk areas and actions taken
- supplier engagement outcomes
- training coverage for relevant roles
- themes from reporting and how we responded

9. Legal and regulatory developments

We keep legal and regulatory developments under review to ensure our approach remains proportionate and effective.

UK: Updated statutory guidance on section 54 statements. The UK Home Office issued updated statutory guidance on 27 March 2025. This did not change section 54 itself, but it raised expectations on quality, specificity, and how organisations explain risk and impact. We have continued to align this statement to that approach.

UK: Public procurement expectations (Procurement Act 2023). The Procurement Act 2023 regime applies to procurements commenced on or after 24 February 2025, including exclusions linked to certain offences and stronger expectations for supplier standards. We continue to align our supplier assurance and record-keeping accordingly.

EU: Forced Labour Regulation (EU) 2024/3015. Where our supply chains support goods placed on the EU market, we are preparing for the EU Forced Labour Regulation, which prohibits products made with forced labour and is expected to apply from December 2027.

10. Approval

This statement was approved by the Board of Directors of STATOM Group on 1 January 2026 and signed by:



Martina Oyite
Group Chief People Officer
STATOM Group