

It is the policy of Hercules Site Services to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly.
- To any public official with the intention of influencing the official in the performance of his duties.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. Gifts received over a monetary value of £100 must be declared and registered on the internal register of gifts. Hospitality received above a monetary £250 does not require pre-approval but must be recorded on the internal register of gifts. Gifts and hospitality given above the threshold must be pre-approved by the relevant Head of Department or the ensuing higher level of seniority above this grade and logged on the internal register of gifts.

The internal gift register will be updated on a monthly basis and managed internally by the Compliance Team. Contact quality@hercules-construction.co.uk for a copy of the form and to return completed forms.

We will not provide or receive gifts or hospitality with the intention to induce improper behaviour or to influence a decision unfairly. Gifts or hospitality provided or received must always be reasonable and proportionate. Gifts and hospitality are for legitimate purposes only e.g. building goodwill and not to gain a competitive advantage, to persuade or influence anyone to act improperly in the performance of their/our duties.

Offering gifts or hospitality during competitive bidding processes should be avoided entirely. If an offer is received during this period, it should be politely declined and reported to the Compliance Director.

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us. We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

We will retain financial records and have appropriate internal controls in place, which will evidence the business reason for making any payments to third parties. Our Internal control systems and procedures are subject to internal and external audit.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be approved prior to expenditure in line with our expenses policy. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Risk assessment is carried out for all roles within the organisation and mandatory Anti-Bribery & Corruption training is carried out for all identified higher risk roles.

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Anti-Bribery Policy

(in compliance with The Bribery Act 2010)

Employees and learners will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee or learner will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken. Concerns should be raised to the Compliance Director or following PD 08 – Whistleblowing Policy as appropriate.

As relevant to role in the organisation, this policy should be read in conjunction with HLPD 01 High Level Anti-Bribery & Corruption Policy.

The responsibility for the implementation of this policy lies with the CEO. The CEO shall review this policy annually or following significant changes.



Brusk Korkmaz
 Chief Executive Officer
 Hercules Site Services PLC

Approved on: 29/11/2024



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