

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Hercules PLC has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We understand the high risks of modern slavery faced by our organisation due to our provision of labour service and we have put in place full and robust systems and procedures to combat this risk. Our procedures include checks at every stage of an employee's time with the company, including recruitment, induction and throughout employment with the company via regular targeted inspections and spot checks of records, in addition to our Modern Slavery Reporting Process.

Through our Business Partnership with Stronger Together, being signatories of the GLAA Construction Protocol and Members of the GLAA Forum, we are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Modern Slavery Working Group consists of members from key areas of the business, including Recruitment, HR, Operations, Project Management, Health & Safety, Business Development and Compliance. The Working Group meets on a regular basis with every member having a clearly defined role, set of responsibilities and accountabilities to transform the way our business manages all aspects of modern slavery. To ensure the group delivers benefits to the business their performance is measured against specific KPIs reviewed by the Senior Leadership Team.

**Our Policies and Procedures:** We operate a number of internal policies and processes in order to ensure that we are conducting business in an ethical and transparent manner and making every effort possible to stamp out the risk of modern slavery in our organisation and supply chain. These include:

- Modern Slavery Policy
- Ethical Business Policy
- Modern Slavery Procedure
- Whistleblowing Policy
- Recruitment Procedure - We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Additional processes are in place at recruitment stage specifically targeted at spotting signs of modern slavery.
- Induction Procedure – Running alongside our standard induction process is our specific modern slavery Induction process which includes guidance to induction staff, spotting signs of modern slavery, awareness of modern slavery and our reporting process and helplines.
- Inspection / Checking Procedure – Regular modern slavery inspections are carried out by trained staff over every area of the organisation, on site and in Head Office.
- Reporting Procedure – We have a reporting procedure in place which is communicated throughout Hercules and any potential concerns are fully investigated and action is taken where necessary.

**Training:** Mandatory training through workshops or e-learning is carried out for all identified roles involved with employee or learner contact. We regularly brief all management and staff members and ensure that our policies reach every employee in order that they understand the signs of modern slavery and what to do if they suspect that there is any risk of it taking place within any area of our business or our supply chain. As Stronger Together Business Partners and Partners of the Supply Chain Sustainability School, we work to promote their available resources and toolkits to educate our supply chain and the construction industry as a whole on modern slavery.

**Our Suppliers:** Hercules operates a Procurement Procedure and maintains an Approved Supplier List. Risk mapping is carried out for all suppliers, with full modern slavery risk assessment carried out across the

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businesses of identified high risk suppliers. During verification we conduct checks and require confirmation that suppliers:

- Have taken steps to eradicate modern slavery within their business
- Hold their own suppliers to account over modern slavery

**Our Performance Indicators:** We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- We achieve a level of communication and personal contact with every employee and their understanding of, and compliance with, our expectations regarding modern slavery.

The CEO shall review this policy annually or following significant changes.



Brusk Korkmaz  
Chief Executive Officer  
Hercules PLC

Approved on: 20/05/2025



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