

In this policy, ‘Whistleblowing’ means the reporting by employees of suspected misconduct, illegal acts or failure to act with Hercules PLC.

The aim of this policy is to encourage employees, learners and others who have serious concerns about any aspect of Hercules’ work to come forward and voice those concerns.

## Qualifying Disclosures

1. Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that Hercules PLC has committed a “relevant failure” by:
  - Committing a criminal offence
  - Failing to comply with a legal obligation
  - A miscarriage of justice
  - Endangering the health and safety of an individual
  - Environmental damage
  - Concealing any information relating to the above
2. These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen.
3. The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest”. We encourage you to use the procedure to raise any such concerns.

## The Procedure

1. In the first instance you should report any concerns you may have to the HR Team, your line manager, the CEO or the relevant Director, as appropriate. The matter will be treated with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.
2. Reports can be made anonymously, and we will investigate all reports regardless of the source, however anonymous reporting may make the subject more difficult to investigate. Anonymous reports may be issued to the Hercules Speak Up mailbox ([speakup@herculesplc.com](mailto:speakup@herculesplc.com))
3. If you do not report your concerns to any of the above the HR Team, your line manager, the CEO or the relevant Director, you should take them direct to the appropriate organisation or body.
4. If you require confidential whistleblowing advice, please contact an organisation such as Protect: [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

## Treatment By Others

Bullying, harassment or any other detrimental treatment afforded to a colleague or learner who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner would be subject to disciplinary action.

Hercules PLC will take any concerns that may be raised relating to the above matters very seriously.

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



Brusk Korkmaz  
Chief Executive Officer  
Hercules PLC

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