

# Modern Slavery Act Transparency Statement 2023

This statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015. It sets out the steps that Hercules Site Services PLC has taken in 2023 to prevent slavery and human trafficking taking place in any part of its business or that of its supply chain.

## Our Business

Hercules Site Services was founded in 2008 and is recognised nationally as a construction, utilities and civil engineering organisation with high ethical standards and a passion for providing clients with a reliable service of the highest quality within the civil engineering industry, delivering labour supply, subcontract packages, security services, suction excavator hire, construction training, white collar recruitment and digital solutions. The Hercules team prides itself on its community support, high moral values and integrity.

The company Head Office is based near Cirencester although our large workforce spans the entire length and breadth of the UK, with most projects utilising locally trained individuals to facilitate the works. Within the last few years the company has expanded into other sectors of the construction industry.

## Our Codes of Conduct

Modern Slavery is a crime and a violation of our fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. The International Labour Organisation (ILO) estimates that at any one time over 40 million men, women and children are working in conditions of modern slavery, including trafficked persons. The vast majority of these people are in the supply chains of legitimate industries.

We are committed to operating responsibly, particularly with regard to human rights issues and Hercules is accredited to Ethical Employment Certification with Achilles. We will not tolerate human trafficking or any other kinds of slavery within our operations. Our people and those we work with are encouraged to challenge any unethical, dishonest or unacceptable behaviour they encounter and to speak up if they see things that don't meet our high standards.

## Our Policies

We have in place a number of key policies which explicitly state how we operate as a business and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. All of our policies are available on our website [www.hercules-construction.co.uk](http://www.hercules-construction.co.uk) and are communicated to every employee upon joining the company and whenever any updates are made. Our relevant policies include:

- Modern Slavery Policy
- Ethical Business Practice Policy
- Equality, Diversity & Inclusion Policy
- Whistleblowing Policy

We conduct a review of all policies annually, making updates where required to ensure all ethical business practices are suitably covered. We continually assess our business processes and have a whistleblowing procedure in place to ensure their continued effectiveness. In 2016 we implemented our Modern Slavery Policy Statement, making its requirements a mandatory condition of employment.

Our Modern Slavery Working Group created and monitored specific Modern Slavery KPIs for 2023, which were reviewed quarterly and reported during Management Review and SLT Meetings.

## Risk Assessment

Our cross-organisational Modern Slavery Working Group was established in 2019, consisting of members of HR, SHEQ, Recruitment, Operations, and CSR, working together to improve our processes around modern slavery. The group has conducted further risk assessment of our operations across 2023, identifying that the biggest exposure we still face to modern slavery and human trafficking is through our recruitment practices, including Right to Work and identity checks. Our risk assessment was carried out against the likelihood of the following traits of slavery and human trafficking occurring:

- Forced Labour
- Work and life under duress

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This has enabled us to continue to prioritise our Right to Work and ID checks, ensuring that the measures we have in place to identify any discrepancies are effective. The risk assessment process also considered the risks associated with sub-contractors and through our supply chain.

An Internal Audit specifically on our Modern Slavery procedures is included in our Annual Internal Audit Programme in order to monitor and assess the risks of modern slavery and ensure compliance through site induction due diligence, management meetings and site visits.

## Our People

We undertake action to prevent modern slavery and human trafficking within our own organisation through:

- Regular inspections carried out by trained staff on a minimum monthly basis, both in Head Office and on site throughout the entire organisation, against a checklist of alert flags. If any alert flags have been raised this is escalated to a full investigation.
- Informing all employees about their statutory rights, including sick pay, holiday entitlements, parental leave, flexible working and any other benefits to which they may be entitled.
- Being registered as a certified Living Wage Employer since 2020. Hercules pays all its employees at least the minimum living wage and we ensure that we comply with all legal requirements.
- Ensuring all new employees are subject to rigorous pre-employment checks, making sure of their right to work in the UK and to confirm their identity. Our checks include for employees being able to provide evidence that they are in possession of their own identification documents.
- Completion of a Modern Slavery Induction, which is carried out in addition to the full company induction and confirms evidence of identification provided and that no fees were paid to obtain work. It also ensures that Modern Slavery awareness training has been carried out, signs of potential victims have been verified at induction by the Operations Team, and that Stronger Together leaflets have been issued. The Induction Checklist also offers helplines if any suspicions of slavery has been raised.
- Confirmation that bank account details provided for the payment of salary match the name of the employee and, where discrepancies arise, investigating. We may require further assurance to ensure the employee is not subject to modern slavery. Where documents which link the employee with the payee cannot be provided, this is escalated to senior members of the HR Team and Modern Slavery Working Group for assessment. We also conduct thorough audits of, and investigate any instances, where more than one employee's salary is being paid into any single bank account.
- Hercules managers carrying out direct face to face checks with all employees (potential candidates, new employees and existing staff) and communicating awareness of the signs of modern slavery in the workplace. We ensure every employee has access to helplines and information, and we conduct any necessary checks or investigations if any concerns have been raised.
- Our confidential whistleblowing procedure. There were no reports of human rights, slavery or human trafficking via the whistleblowing process in 2023. In addition to our whistleblowing process, our free confidential Employee Assistance Programme is available 24/7 to all employees on issues such as financial, legal, workplace, family and health. Employees are made aware of the support available as part of the induction process and via our company newsletter.
- Developments in 2023 of our HR App, designed to work alongside our Personnel Management System Database and Recruitment App, made the verification of Right to Work and personal documents even more failsafe due to the automatic checks with the systems, whereby any replication of details, e.g. mobile telephone numbers, next of kin details, address, bank details, are automatically flagged on the system for further investigation.

## Due Diligence of Our Supply Chain

We have conducted further in-depth review of our procurement processes and our supplier approval procedure:

- Our Supplier Approval Questionnaire requires suppliers to provide copies of their Modern Slavery Policy Statements as part of the process.
- Suppliers are required to confirm the actions they are taking to ensure labour exploitation, modern slavery and human trafficking are not taking place in any part of their business or supply chain.

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- Suppliers are expected to comply with all applicable laws, statutes, regulations and codes and state that no recruitment fees are passed on to any employees.
- We require, where appropriate, that our suppliers hold certification via a reputable accreditation scheme provider (e.g. ISO, UVDB, RISQS).
- We do not utilise suppliers that are based in or sourcing from high risk countries of origin.
- Risk mapping is carried out on all suppliers prior to approval and full risk assessment is undertaken on our Top 10 suppliers.
- Where necessary, supplier visits are organised.

## Raising Awareness

Raising awareness both internally and externally of the human rights aspects of slavery and trafficking is a fundamental step in preventing it occurring within our operations. We know that unethical labour practices, including slavery and human trafficking, are hidden. We have robust policies and procedures in place setting out our stance and how we must operate. We recognise that raising awareness of the human rights aspects of slavery and trafficking is a fundamental action in bringing to light any issues within any part of our business or our supply chain.

- Back in 2019 we had made modern slavery training mandatory for certain identified roles within the organisation and to date for 2023 100% of identified roles and employees completed the training to date. Identified roles include:
  - Directors
  - Operations Team
  - Human Resources
  - Senior Management
  - Recruitment Team
  - Site Management
- All Hercules employees have access to e-learning modules on modern slavery via the Supply Chain Sustainability School, with which we are Partners and Gold Members, and this learning is actively encouraged.
- In 2023 we continued the roll out of further training for front line supervisors in the form of toolbox talks and video training, promoting awareness of the typical signs of someone working in enslaved conditions. This training also includes how to report concerns either via the whistleblowing process or to Hercules leadership.
- We further raised awareness of modern slavery throughout the entire organisation via the company newsletter, posters on staff noticeboards, video training, toolbox talks and briefings on site.
- In 2023 we successfully started the roll out of our Hercules 'Beacon Card'. The discreetly designed card has been given out on several of our own projects with toolbox talks delivered that describe 4 scenarios where it would be suitable to report a modern slavery concern. We explain what the card symbolises and how to use it and have included a dedicated modern slavery helpline on the card for those who require further assistance.

## Partnerships

### Supply Chain Sustainability School

Hercules is a partner of the award-winning Supply Chain Sustainability School, a free training provider for the industry covering a wide range of topics including modern slavery. As a partner, we promote access to the school's resources to our employees and supply chain. We are inaugural signatories of the People Matter Charter and promote this throughout the organisation.

Since 2017 we have been active members of the school's Infrastructure Leadership Group and our staff have chaired the Minimum Standards Labour Group within the school in which they are tackling key issues such as Modern Slavery, Right to Work, EDI and FIR, Living Wage, Labour Standards, Skills and Training, Environment & Performance, and Employment Conditions.

### Stronger Together



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Hercules have been Business Partners with Stronger Together since 2019, a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third-party exploitation of workers. They provide guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.

## **GLAA Construction Protocol**

Hercules are signatories of the Gangmasters and Labour Abuse Authority's Construction Protocol. This is a joint industry agreement aimed at eradicating slavery and labour exploitation, committing signatories to:

- Work in partnership to protect vulnerable workers
- Agree to share information, where possible, to help stop or prevent the exploitation of workers
- Work together to manage information sensitively and confidentially
- Commit to raising awareness within the supply chain
- Maintain momentum through this protocol by communicating regularly

In 2019 we joined the GLAA Forum and have continued to be active members of the GLAA Construction Protocol events and forums through 2023.

## **RISQS Modern Slavery Working Group**

Hercules are active members of the RISQS Modern Slavery Working Group since 2019, working together with representatives from the rail industry to raise awareness and tackle slavery and labour exploitation within the industry.

## **Next Steps**

Whilst we continue to develop our processes and ensure we have a greater understanding of modern slavery and how to mitigate it in our own business and in our supply chain, there is always more that we can do. These will be our key areas of focus in the coming 12 months:

- Ensure that the objectives of the "People Matter Charter" around Modern Slavery continue to be fully integrated into our processes and those of our supply chain.
- Continue the successful roll out of our Hercules 'Beacon Card'.
- Further our impact on this issue by working together with victim rehabilitation organisations and offering work opportunities in the construction industry to ex-victims of modern slavery through a Victim Re-integration Scheme.
- Modern Slavery specific KPIs and targets to be in place for 2024 and monitored on a quarterly basis by the Modern Slavery Working Group.
- Further our Business Partnership status with Stronger Together to 'Advanced' potentially with a view to becoming 'Verified'.

This statement covers the period 1 January 2023 to 31 December 2023 and has been approved by the CEO of Hercules Site Services PLC.

Brusk Korkmaz

Chief Executive Officer  
Hercules Site Services PLC