

# Anti-Bribery Policy

## (in compliance with The Bribery Act 2010)

It is the policy of Hercules PLC 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 someone or to reward someone for performing their duties improperly.
- To any public official with the intention of influencing the official in the performance of their duties.

This policy does not prohibit the giving and receiving gifts of low value or normal and appropriate hospitality. 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 offered or received must always be reasonable and proportionate. Gifts and hospitality are to be used for legitimate purposes only e.g. building goodwill and not used to gain a competitive advantage or to persuade or influence anyone to act improperly in the performance of their/our duties.

A tiered system is used to guide decision-making:

### Acceptable

- Promotional gifts such as branded items (e.g. pens, notebooks, mugs) or low value gifts given or received (for example as a thank you gift) with a value under £100.00.
- Light refreshments at meetings (e.g. tea, coffee, biscuits, lunch etc.).
- Modest hospitality at business events, provided it is customary and not lavish and does not exceed £250.00 in total value.

### Requires Approval

- Gifts over £100.00 and hospitality over £250.00 (whether given or received) must be approved by the relevant Head of Department and recorded in the Internal Gifts & Hospitality Register.
- Hospitality involving extended travel, repeat offerings or exceeding £500.00 in value must be reviewed for appropriateness and approved at Director level.

### Always Prohibited

- Cash or cash equivalents (e.g. vouchers, gift cards, loans).
- Lavish, excessive or inappropriate hospitality or entertainment (e.g. luxury travel, gambling).
- Any gifts or hospitality offered during an active competitive bidding or tendering process.
- Gifts or hospitality given or received in exchange for preferential treatment or an unfair advantage.

Any gifts or hospitality offered by a Hercules PLC Director, that requires approval, must be approved by the CEO or the CFO. Gifts or hospitality offered by the CFO or CEO, that requires approval, must be approved by the Non-Executive Chairman.

If a gift or hospitality offer is received during a tender process, it must be politely declined and reported immediately to the Compliance Director.

All gifts and hospitality received or provided above the thresholds must be recorded immediately in the Internal Gifts & Hospitality Register (DPF 131). The register must be maintained in real time and will be monitored for compliance by the Compliance and Finance Teams. Senior Management will conduct a quarterly review of all

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recorded gifts and hospitality. Random audits will be conducted to identify trends or potential risks. Where a client, external stakeholder or other relevant third party has requirements for reporting Gifts and Hospitality that are different and more stringent from our own, their guidelines must be adhered to and reported on the Internal Gifts & Hospitality Register accordingly.

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.

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 or corruption, even if they turn out to be mistaken. Concerns should be raised to the Compliance Director or following PD 08 – Whistleblowing Policy as appropriate. All reports will be investigated promptly and appropriate action taken and any breach of this policy will be taken seriously and may result in disciplinary action, including termination of employment. Serious breaches may be reported to law enforcement agencies, leading to criminal prosecution A clear escalation process will ensure that all non-compliance issues are addressed immediately.

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 PLC

Approved on: 01/12/2025



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