

# Whistleblowing Policy Statement

## Purpose

This policy sets out Hercules PLC's commitment to encouraging employees, learners, contractors, suppliers, and others to report suspected misconduct, illegal acts, or failure to act. We aim to create a safe environment where concerns can be raised without fear of retaliation

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.

## Definition

"Whistleblowing" means the reporting of suspected wrongdoing or dangers in relation to Hercules PLC's activities. This includes criminal offences, breaches of legal obligations, health and safety risks, environmental damage, or attempts to conceal such matters

## 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. **Internal Reporting:** 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. **Anonymous Reporting:** 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. **Escalation:** 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. **Independent Advice:** For confidential whistleblowing advice, please contact an organisation such as Protect: [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

## Protection and non-retaliation

Hercules PLC guarantees that no employee or individual will suffer dismissal, demotion, disciplinary action, or any form of retaliation for raising a concern in good faith. Bullying, harassment, or detrimental treatment of whistleblowers is strictly prohibited and will result in disciplinary action

## 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.

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## Data Protection

All whistleblowing reports will be securely stored and handled in compliance with GDPR, [PD 09 – Data Protection Policy](#) and [PD 11 – Information Security Policy](#).

## Training and Awareness

Hercules PLC will provide regular training and guidance to ensure employees understand how to raise concerns and their rights under this policy.

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



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Chief Executive Officer  
Hercules PLC

Approved on: 01/12/2025



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