

# Ethical Business Practice Policy

Hercules PLC recognises the importance of adhering to the principles of ethical business practice in the delivery of its activities and is committed to operating its business sustainably and responsibly and in full compliance with all relevant laws and regulations.

This policy applies to all directors and employees of Hercules, along with its supply chain. It applies in addition to and alongside the other policies, procedures and statements that have been issued by Hercules.

We aim to conduct our operations on sound business principles with trust, honesty and integrity and with respect for the human rights and interests of our employees. We respect the legitimate interests of all those with whom we have relationships.

## **Ethical business practice includes:**

**Our Employees, Human Rights and Labour Standards** – We are committed to providing a working environment in which employees can realise their full potential and contribute to business success.

In accordance with the Modern Slavery Act 2015 we ensure that employment is freely chosen, child labour shall not be used, and wages are not lower than minimum wage (refer to PD 07 and procedure QS 12).

In compliance with the Human Rights Act 1998 we are committed to treat everyone equally, with fairness, dignity and respect, and that freedom of association is respected. We are committed to diversity in a working environment where there is mutual trust and respect where everyone is accountable for their actions and feels responsible for the performance and reputation of our company. We aim to recruit, employ and promote employees on the sole basis of their ability to fulfil the requirements of the job. We are committed to developing and enhancing each employee's skills and capabilities (refer to PD 06).

We will provide our employees and learners with safe and healthy working conditions and practices. We monitor and report our health and safety performance (refer to PD 03).

**Zero Tolerance to Bribery and Corruption** – Bribery and corruption will not be tolerated and the giving and receiving of bribes is contrary to the Bribery Act 2010 and can play no part in the way Hercules carries out its business (refer to PD 05).

**Zero Tolerance to Fraud** – All employees, subcontractors and suppliers must act honestly and with integrity at all times. All reasonable suspicions of fraud must be reported in line with the Whistleblowing Procedure (refer to PD 08). No accounts must be kept “off the book” to facilitate or conceal improper payments.

**Zero Tolerance to Tax Evasion and the Facilitation of Tax Evasion** (refer to PD 20) – It is not acceptable to:

- Participate in any activity that may be regarded as tax evasion or the facilitation of tax evasion.
- Agree to enter into any arrangement with employees, clients, suppliers or contractors that may lead to the diversion of any tax away from relevant authorities.
- Assist any individuals in any of the above activities.

Our zero-tolerance commitment applies to our supply chain.

Employees, Suppliers, Subcontractors and Clients will be encouraged and monitored to adopt best practice, which will lead them to continually improve their and our performance. Employees, learners, visitors and contractors are to fully support this policy through their active participation and co-operation.

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



Brusk Korkmaz  
Chief Executive Officer  
Hercules PLC

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