



# Conflict of Interest Policy

Hercules PLC is committed to maintaining the highest standards of integrity and transparency in all aspects of our operations. This policy sets out our approach to identifying, managing, and mitigating conflicts of interest to ensure that all business decisions are made in the best interests of Hercules and free from improper influence.

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 conflict of interest arises when an individual's personal, financial, or other interests – or those of a person connected to them – could interfere with their duty to act in the best interests of the company.

All employees must disclose any actual or potential conflict of interest. This includes, but is not limited to:

- Personal relationships involving other Hercules employees or external parties such as clients, suppliers, contractors, learners or competitors, where the relationship may influence, or be perceived to influence, impartial decision-making. This includes romantic relationships, close friendships, and family ties.
- External business interests or employment that may compete with, conflict with, or otherwise affect an employee's responsibilities to Hercules, including directorships, shareholdings, or advisory positions.
- Any situation where an employee stands to benefit personally or professionally from a decision they are involved in making on behalf of Hercules.

## Disclosure and Review Process

- Initial Disclosure: Employees must report any actual or potential conflicts of interest as soon as they become aware of them, to their Line Manager or the Compliance Team.
- Register of Interests: All disclosed interests will be recorded in the Hercules Conflict of Interest Register (DPF 135), maintained by the Compliance Team.
- Where appropriate, mitigating actions will be agreed and signed off by the relevant Senior Manager.
- Review: Disclosed interests will be reviewed quarterly by Senior Management to determine whether the conflict remains relevant or whether further action is required.
- Following review and where applicable, affected 3<sup>rd</sup> parties will be notified regarding any conflict of interest.
- Changes: Employees must promptly notify the Compliance Team of any change in circumstances that may create or remove a conflict.

Where a conflict is identified, appropriate mitigation will be considered, which may include:

- Adjusting responsibilities
- Requiring recusal from certain decisions or activities
- Ceasing the conflicting activity altogether

Failure to disclose or manage a conflict appropriately may result in disciplinary action.

All disclosures will be handled sensitively and in accordance with data protection principles. Where appropriate, confidentiality will be maintained.

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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