

## Welcome to our supply chain

This Supplier Code of Conduct forms part of our supplier governance framework and should be read alongside our supplier onboarding documents, Terms and Conditions for the Supply of Goods and Services, and any written agreement, scope or specification agreed with us. It sets out the standards of conduct we expect from suppliers who work with us or on our behalf.

We are a leading UK infrastructure and construction services group, and in order to maintain the high standards our clients expect from us, we expect all suppliers to meet these standards and share our values.

We are committed to conducting business in a responsible, ethical and sustainable way and we expect the same of our suppliers. Our Code of Conduct is based on our core company values:



Our purpose is to provide opportunities, support positive change across the construction industry, and deliver added value across all of the services we provide. To achieve this, we foster a culture of inclusion, collaboration, and innovation throughout our organisation and we aim to build collaborative, long-lasting and mutually beneficial relationships with like-minded suppliers.

## Who this code applies to

Our Supplier Code of Conduct applies to all providers of goods and services in their work with Hercules. This includes suppliers, subcontractors, service providers, professional service providers, personal service companies, consultants, intermediaries, agents and any other person or organisation engaged to support the supply of goods or services to Hercules.

|                |                                    |               |            |
|----------------|------------------------------------|---------------|------------|
| Document Name  | DPF 100 – Supplier Code of Conduct | Date Created  | 22/11/2022 |
| Version Number | 04                                 | Revision Date | 30/06/2026 |

As a supplier, you are responsible for ensuring that the principles and expectations set out in this Code are understood and followed by your employees, workers, subcontractors, consultants, agents, representatives and anyone else acting on your behalf or within your supply chain in connection with work for Hercules.

## Health, Safety & Wellbeing

The health and safety of our people is our top priority, and we believe that everyone should be safe in their workplace. We recognise that health, safety and well-being are intrinsically linked and that a healthy, happy workforce is a safer, more productive workforce. Safety culture is improving all the time across our industry and we are proud that this is an area where we can help deliver positive change.



### What does this mean for our suppliers?

- You must ensure that your own workforce, and everyone within your own supply chain, are adequately trained and provided with the proper equipment to safely carry out their work.
- You must work together with Hercules, and any other relevant organisations, to ensure a healthy and safe working environment.
- You must recognise that all employees have an obligation to stop unsafe work and ensure that they are empowered to do so.

You must report all health and safety incidents related to work you do for us, goods you provide to us, our project sites, and our workplaces, to your relevant Hercules contact.

## Compliance with Laws and Regulations

You are required to comply with all applicable laws, regulations and industry requirements relevant to the goods or services you provide. You are also required to comply with this Supplier Code where it sets a higher standard than the law, provided it does not conflict with legal requirements.

Customs, local practices or informal ways of working must never take precedence over legal, regulatory or contractual requirements.

All suppliers must be able to demonstrate, where reasonably requested, that they comply with applicable legal and regulatory obligations, including those relating to tax, labour standards, employment rights, health and safety, data protection, anti-bribery, modern slavery, environmental compliance and fair competition.

## Anti-corruption, Anti-bribery and Business Integrity

Our policy is 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.

### What does this mean for our suppliers?

- You must comply with the Bribery Act 2010 and all applicable anti-bribery, anti-corruption, fraud, tax evasion, money laundering and economic crime laws.
- You conduct business honestly, ethically and with integrity.
- You do not request, accept, pay, offer, authorise or facilitate bribes, facilitation payments, kickbacks, improper payments or improper advantages, either directly or indirectly.
- You do not seek to improperly influence decisions made by Hercules, our clients, suppliers, employees, representatives or any other party.
- You ensure that all reports, records, invoices and information provided to Hercules are complete, accurate and not false or misleading.

|                |                                    |               |            |
|----------------|------------------------------------|---------------|------------|
| Document Name  | DPF 100 – Supplier Code of Conduct | Date Created  | 22/11/2022 |
| Version Number | 04                                 | Revision Date | 30/06/2026 |

- You do not conceal, support or ignore dishonest, improper or unethical conduct either connected with work for Hercules or anywhere else within your organisation or supply chain.

## Hospitality and Gifts

We do not request, accept, offer, authorise or provide hospitality or gifts that may improperly influence business decisions, or decisions by our clients, suppliers, or others with whom we might work. Any hospitality, gifts or expenses must be reasonable, proportionate, transparent and properly recorded. No accounts, records or arrangements must be kept “off book” to facilitate or conceal improper payments or improper influence.

### What does this mean for our suppliers?

- You do not offer or accept hospitality or gifts that may improperly influence your business decisions or those of Hercules, our clients, or others.
- You keep appropriate records of hospitality or gifts offered or accepted and make these available on request where relevant to work with Hercules.

## Conflict of Interest

A conflict of interest is a situation in which a person might be in a position to derive personal benefit from actions or decisions made in their official capacity. Conflicts of interest happen whenever our personal interests, activities or relationships interfere with our objectivity or loyalty to the organisation we are employed by. We require our employees to avoid conflicts of interest and not allow themselves to be put in a position where a conflict of interests arises. Decisions taken out of personal interest are unethical.

### What does this mean for our suppliers?

- You must notify Hercules if you become aware of an actual, potential or perceived conflict of interest connected with your work for Hercules.
- You must avoid situations that may create a conflict of interest or the appearance of a conflict of interest.
- You must be open and transparent about any personal, financial, business or other relationship that could affect, or appear to affect, decisions made in connection with Hercules.
- You must not allow personal interests, relationships or outside activities to improperly influence work carried out in relation to Hercules.

## Fair Competition

Hercules is committed to fair competition and understands that this benefits our stakeholders and wider society, driving improvement and innovation. Competition law ensures businesses are competing with one another and are protected from others acting unfairly. All businesses must comply with competition law and there can be serious consequences for businesses and individuals, including directors, for non-compliance.

### What does this mean for our suppliers?

- You practice fair competition and are committed to complying with the law.
- You do not engage in cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.
- You do not engage in bid-rigging, inappropriate discussion of tenders, sharing of commercially sensitive information, or any other arrangement that limits fair competition in tender situations.
- You do not tolerate any violation of antitrust laws, competition laws or related regulations.

## Reporting Misconduct

Hercules is committed to maintaining an ethical culture and to investigating reports of suspected or known misconduct appropriately. You, your employees, workers and supply chain are expected to report any suspected or known misconduct connected with work for Hercules. This includes concerns relating to unlawful conduct,

|                |                                    |               |            |
|----------------|------------------------------------|---------------|------------|
| Document Name  | DPF 100 – Supplier Code of Conduct | Date Created  | 22/11/2022 |
| Version Number | 04                                 | Revision Date | 30/06/2026 |

unsafe working, modern slavery, fraud, bribery, improper influence, conflicts of interest, discrimination, harassment, data protection, environmental breaches or any other conduct that does not meet the standards expected by Hercules.

You can report concerns to the relevant Hercules manager or by contacting the Human Resources Department at Head Office. Alternatively, you can raise a concern confidentially using the contact details below:

**Email:** [speakup@herculesplc.com](mailto:speakup@herculesplc.com)

**Tel:** 01793 336851

For confidential whistleblowing advice, you may also contact an independent organisation such as Protect: [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

Hercules will not retaliate against anyone who raises a genuine concern in good faith, and we do not tolerate retaliation by others.

You must not retaliate against, disadvantage, dismiss, threaten, victimise or otherwise treat anyone unfairly because they have raised a concern or supported an investigation in good faith. This applies to your own workforce and anyone within your supply chain.

## Auditing and Cooperation

Hercules reserves the right to monitor and review supplier compliance with this Code. You must cooperate with reasonable requests for information, records, explanations or access where this is required to allow Hercules to understand whether the standards set out in this Code are being met.

You are also expected to take reasonable steps to ensure that your own supply chain complies with the principles in this Code. Where concerns or non-compliance are identified, you must take appropriate action to address them in a timely manner.

Failure to comply with this Code may affect your ongoing relationship with Hercules and may result in further action, including suspension, removal from our approved supplier list or termination of the relevant agreement.

## Modern Slavery

Modern slavery remains a serious risk across UK supply chains, including construction. We are determined to do everything we can to eradicate modern slavery throughout our operations, and we are proud to be working in partnership with Stronger Together to raise awareness of this issue and educate our workforce, our supply chain, and the wider industry, about the signs of modern slavery and the approaches to take to raise concerns. Through close relationships with our workforce, our clients, and organisations such as Stronger Together and the Modern Slavery Helpline, we hope to eradicate this issue.



### What does this mean for our suppliers?

- You must have a robust recruitment process and comply with all Home Office requirements for conducting right to work checks.
- You must implement appropriate measures to safeguard against human trafficking and individuals being forced to work against their will in your own organisation and in your supply chain.
- You should have your own Modern Slavery Policy and you must publish a modern slavery statement where your business is required to under section 54 of the Modern Slavery Act 2015.
- You should conduct Modern Slavery awareness training within your organisation.
- You must ensure that no fees or costs for recruitment are passed on to your workers, either directly or indirectly, in whole or in part.

|                |                                    |               |            |
|----------------|------------------------------------|---------------|------------|
| Document Name  | DPF 100 – Supplier Code of Conduct | Date Created  | 22/11/2022 |
| Version Number | 04                                 | Revision Date | 30/06/2026 |

## Equality, Diversity & Inclusion

We are committed to promoting diversity and providing equal opportunities throughout our organisation, recognising that a diverse workforce is a more effective, efficient and happy workforce. Our aim is for our business to be a true representation of the local communities that we work in and we actively encourage people of all backgrounds to work with us.

We strive to ensure that everyone we work with shares our commitment and embraces their colleagues' backgrounds regardless of gender, ethnicity, religion, sexuality, disability or any other perceived difference and we have embedded the principles of the Fairness, Inclusion and Respect (FIR) toolkit throughout our organisation.

By making Hercules a positive, inclusive place to work, we can ensure that everyone we work with feels safe, supported and valued for who they are.

### What does this mean for our suppliers?

- You do not tolerate disrespectful behaviour, bullying, discrimination, harassment or unwanted sexual advances.
- You do not discriminate and you provide equal treatment and opportunities for all employees, job applicants, contractors and other third parties, irrespective of their gender, sexual orientation, marital status, race, colour, nationality, ethnicity or national origin, religion, age, disability or union membership status.
- You embrace and promote a fair, inclusive and respectful culture.

## Environment and Sustainability

We are committed to protecting the environment and to delivering sustainable business outcomes throughout our varied business activities. We take our Environmental commitments seriously and we have implemented our own Carbon Reduction Plan in order to help us achieve our goal of reducing our carbon emissions, achieving Net Zero, and creating a sustainable future for our business and the environment.

Our Sustainable Procurement Strategy has been developed to support us in delivering our services in a sustainable way by promoting the procurement of sustainable solutions, products, and materials, and developing long-term, sustainable business relationships with our clients, our supply chain and other external stakeholders.

### What does this mean for our suppliers?

- You must conduct your operations in an environmentally responsible manner and in accordance with all applicable environmental laws.
- You should follow sustainable business practices and aim to work towards the principles of sustainable procurement.
- You should have, or plan to implement, your own strategy for reducing your carbon emissions.

## Protection of Assets, Information, Property and Equipment

We safeguard and protect our assets from damage, theft loss and misuse, as they are essential to our business. Assets can be either tangible or intangible. Tangible assets are items such as raw materials, money, products, machines and equipment, computers, and real estate. Intangible assets are things such as branding, patents, trademarks, knowledge, information, trade secrets, and copyrights.

We respect confidential information relating to our own intangible assets and those of our clients, our supply chain, and other stakeholders. We take all reasonable measures to prevent confidential information from being disclosed to any person who does not have a right to that information in the course of their work.

### What does this mean for our suppliers?

- You respect the assets of Hercules, our clients, our supply chain, and other stakeholders.
- You only use assets belonging to Hercules and others as and when appropriately authorised.

|                |                                    |               |            |
|----------------|------------------------------------|---------------|------------|
| Document Name  | DPF 100 – Supplier Code of Conduct | Date Created  | 22/11/2022 |
| Version Number | 04                                 | Revision Date | 30/06/2026 |

- You maintain and preserve confidentiality and data integrity when accessing and/or using the information of Hercules, our clients, our supply chain, and other stakeholders.
- You ensure the protection of confidential information entrusted to you by Hercules, our clients, our supply chain, and other stakeholders.
- You do not act on confidential information received in error, whether it has come from Hercules, our clients, our supply chain, or any other stakeholders.

## Data Protection

Everyone has a right to the protection of their personal data and to have their personal data handled lawfully, fairly and securely. We are committed to meeting our legal obligations as laid down by the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

### What does this mean for our suppliers?

- You must handle personal data and confidential information lawfully, fairly and securely.
- You must only use personal data or confidential information for authorised purposes connected with the work you are carrying out.
- You must protect information from loss, misuse, unauthorised access, unauthorised disclosure, alteration or destruction.
- You must ensure that your employees and anyone acting on your behalf understand their responsibilities when handling personal data or confidential information.
- You must report any suspected data breach, cyber incident, loss of information or unauthorised access connected with Hercules information as soon as possible.

|                |                                    |               |            |
|----------------|------------------------------------|---------------|------------|
| Document Name  | DPF 100 – Supplier Code of Conduct | Date Created  | 22/11/2022 |
| Version Number | 04                                 | Revision Date | 30/06/2026 |