

Modern Slavery Act Transparency Statement 2024

This statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015. It sets out the steps that Hercules Site Services PLC has taken in 2024 to prevent slavery and human trafficking from taking place in any part of its business or that of its supply chain.

Our Business

Hercules Site Services was founded in 2008 and is recognised nationally as a collaborative, innovative company delivering services of the highest standards within the Civil Engineering and infrastructure sectors of the construction industry. With multiple divisions within our organisation, our capabilities include the supply of highly skilled blue- and white-collar workers, the delivery of complete civils projects, the delivery of construction related training and the development of innovative digital solutions for construction recruitment, workforce management and data reporting.

The company Head Office is based near Cirencester although our large workforce spans the entire length and breadth of the UK, with most projects utilising locally trained individuals to facilitate the works. Within the last few years the company has expanded into other sectors of the construction industry.

Our Codes of Conduct

Modern Slavery is a crime and a violation of our fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. The International Labour Organisation (ILO) estimates that at any one time over 40 million men, women and children are working in conditions of modern slavery, including trafficked persons. The vast majority of these people are in the supply chains of legitimate industries.

We are committed to operating our business ethically and responsibly, particularly regarding human rights issues, and we hold an Ethical Employment Certification with Achilles. We will not tolerate human trafficking or any other kinds of slavery within our operations. Our people and those we work with are encouraged to challenge any unethical, dishonest or unacceptable behaviour they encounter and to speak up if they see things that don't meet our high standards.

Our Policies

We have in place a number of key policies which explicitly state how we operate as a business and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. All of our policies are available on our website www.hercules-construction.co.uk, are communicated to every employee upon joining the company as well as whenever any updates are made and all employees receive an annual re-briefing of our policies. Our relevant policies include:

- Modern Slavery Policy
- Ethical Business Practice Policy
- Equality, Diversity & Inclusion Policy
- Whistleblowing Policy

We conduct a review of all policies annually, making updates where required to ensure all ethical business practices are suitably covered. We continually assess our business processes and have a whistleblowing procedure in place to ensure their continued effectiveness. In 2016 we implemented our Modern Slavery Policy Statement, making its requirements a mandatory condition of employment.

Our Modern Slavery Working Group created and monitored specific Modern Slavery KPIs for 2024, which were reviewed quarterly and reported during Management Review and SLT Meetings.

Risk Assessment

Our Modern Slavery Working Group has been meeting since 2019, and consists of members of HR, SHEQ, Recruitment, Operations, and CSR, all working together to maintain our high standards and improve our processes around combatting modern slavery. The group has conducted further risk assessment of our operations across 2024, identifying that the biggest exposure we still face to modern slavery and human trafficking is through our recruitment practices, including Right to Work and identity checks. Our risk assessment was carried out against the likelihood of the following traits of slavery and human trafficking occurring:

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- Forced Labour
- Work and life under duress

This has enabled us to continue to prioritise our Right to Work and ID checks, ensuring that the measures we have in place to identify any discrepancies are effective. The risk assessment process also considered the risks associated with sub-contractors and through our supply chain.

An Internal Audit specifically on our Modern Slavery procedures is included in our Annual Internal Audit Programme to monitor and assess the risks of modern slavery and ensure compliance through site induction due diligence, management meetings and site visits.

Our People

We undertake action to prevent modern slavery and human trafficking within our own organisation through:

- Regular inspections carried out by trained staff on a minimum monthly basis, both in Head Office and on site throughout the entire organisation, against a checklist of alert flags. If any alert flags have been raised this is escalated to a full investigation.
- Informing all employees about their statutory rights, including sick pay, holiday entitlements, parental leave, flexible working and any other benefits to which they may be entitled.
- Being registered as a certified Living Wage Employer since 2020. Hercules pays all its employees at least the minimum living wage and we ensure that we comply with all legal requirements.
- Ensuring all new employees are subject to rigorous pre-employment checks, making sure of their right to work in the UK and to confirm their identity. Our checks include for employees being able to provide evidence that they are in possession of their own identification documents.
- Completion of a Modern Slavery Induction, which is carried out in addition to the full company induction and confirms evidence of identification provided and that no fees were paid to obtain work. It also ensures that Modern Slavery awareness training has been carried out, signs of potential victims have been verified at induction by the Operations Team, and that Stronger Together leaflets have been issued. The Induction Checklist also offers helplines if any suspicions of slavery have been raised.
- Confirmation that bank account details provided for the payment of salary match the name of the employee and, where discrepancies arise, investigating. We may require further assurance to ensure the employee is not subject to modern slavery. Where documents which link the employee with the payee cannot be provided, this is escalated to senior members of the HR Team and Modern Slavery Working Group for assessment. We also conduct thorough audits of, and investigate any instances, where more than one employee's salary is being paid into any single bank account.
- Hercules managers carry out direct face to face checks with all employees (potential candidates, new employees and existing staff) and communicating awareness of the signs of modern slavery in the workplace. We ensure every employee has access to helplines and information, and we conduct any necessary checks or investigations if any concerns have been raised.
- There were no reports of human rights, slavery or human trafficking concerns made via our whistleblowing process in 2024. In addition to our whistleblowing process, our free confidential Employee Assistance Programme is available 24/7 to all employees on issues such as financial, legal, workplace, family and health. Employees are made aware of the support available as part of the induction process and via our company newsletter.
- Developments in 2024 of our HR App, designed to work alongside our Personnel Management System Database and Recruitment App, made the verification of Right to Work and personal documents even more failsafe due to the automatic checks with the systems, whereby any replication of details, e.g. mobile telephone numbers, next of kin details, address, bank details, are automatically flagged on the system for further investigation. Additionally, TrustID was implemented into our onboarding process in 2024 to further ensure the thoroughness of Right to Work checks being conducted.

Due Diligence of Our Supply Chain

We have conducted further in-depth review of our procurement processes and our supplier approval procedure:

- Our Supplier Approval Questionnaire requires suppliers to provide copies of their Modern Slavery Policy Statements as part of the process.

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- Suppliers are required to confirm the actions they are taking to ensure labour exploitation, modern slavery and human trafficking are not taking place in any part of their business or supply chain.
- Suppliers are expected to confirm their compliance with all applicable laws, statutes, regulations and codes and state that no recruitment fees are passed on to any employees.
- We require, where appropriate, that our suppliers hold certification via a reputable accreditation scheme provider (e.g. ISO, UVDB, RISQS).
- We do not utilise suppliers that are based in or sourcing from high risk countries of origin.
- Risk mapping is carried out on all suppliers prior to approval and full risk assessment is undertaken on our Top 10 suppliers.
- Where necessary, supplier audits are carried out and visits are organised.

Raising Awareness

Raising awareness both internally and externally of the human rights aspects of slavery and trafficking is a fundamental step in preventing it occurring within our operations. We know that unethical labour practices, including slavery and human trafficking, are hidden. We have robust policies and procedures in place setting out our stance and how we must operate. We recognise that raising awareness of the human rights aspects of slavery and trafficking is a fundamental action in bringing to light any issues within any part of our business or our supply chain.

- Back in 2019 we introduced mandatory modern slavery training for relevant roles within our organisation and in 2024, 100% of employees carrying out an identified role completed their training. Identified roles include:
 - Directors
 - Operations Team
 - Human Resources
 - Senior Management
 - Recruitment Team
 - Site Management
- All Hercules employees complete a mandatory e-learning module on modern slavery via the Supply Chain Sustainability School, with whom we are Partners and Gold Members.
- In 2024 we continued the roll out of further training for front line supervisors in the form of toolbox talks and video training, promoting awareness of the typical signs of someone working in enslaved conditions. This training also includes how to report concerns either via the whistleblowing process or to Hercules leadership.
- We further raised awareness of modern slavery throughout the entire organisation via the company newsletter, posters on staff noticeboards, video training, toolbox talks and briefings on site.
- In 2024 we continued to utilise our Hercules 'Beacon Card' on our own Civils Projects. The discreetly designed card has been given out on selected projects, alongside a Modern Slavery toolbox talk that describes 4 scenarios where it would be suitable to report a modern slavery concern. We explain what the card symbolises and how to use it and have included a dedicated modern slavery helpline on the card for those who require further assistance.

Partnerships

Supply Chain Sustainability School

Hercules is a partner of the award-winning Supply Chain Sustainability School, a free training provider for the industry covering a wide range of topics including modern slavery. As a partner, we promote access to the school's resources to our employees and supply chain. We are inaugural signatories of the People Matter Charter and promote this throughout the organisation.

Since 2017 we have been active members of the school's Infrastructure Leadership Group and our staff have chaired the Minimum Standards Labour Group within the school in which they are tackling key issues such as Modern Slavery, Right to Work, EDI and FIR, Living Wage, Labour Standards, Skills and Training, Environment & Performance, and Employment Conditions. We are also active participants, alongside our Tier 1 clients, on the

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Supply Chain Sustainability School's Built Environment Against Slavery Working Group, the largest anti-slavery collaboration in the UK built environment. The Working Group brings together senior procurement, supply chain and sustainability leads from across the industry, and meets quarterly to look at opportunities to drive a common approach to combatting modern slavery in the industry.

Stronger Together

Hercules have been Business Partners with Stronger Together since 2019, a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third-party exploitation of workers. They provide guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation. In 2024 Stronger Together conducted a workshop for our people on Tackling Modern Slavery in UK Construction, attended by a range of employees from roles across the company.

GLAA Construction Protocol

Hercules are signatories of the Gangmasters and Labour Abuse Authority's Construction Protocol. This is a joint industry agreement aimed at eradicating slavery and labour exploitation, committing signatories to:

- Work in partnership to protect vulnerable workers
- Agree to share information, where possible, to help stop or prevent the exploitation of workers
- Work together to manage information sensitively and confidentially
- Commit to raising awareness within the supply chain
- Maintain momentum through this protocol by communicating regularly

In 2019 we joined the GLAA Forum and have continued to be active members of the GLAA Construction Protocol events and forums through 2024.

RISQS Modern Slavery Working Group

Hercules are active members of the RISQS Modern Slavery Working Group since 2019, working together with representatives from the rail industry to raise awareness and tackle slavery and labour exploitation within the industry.

Next Steps

Whilst we continue to develop our processes and ensure we have a greater understanding of modern slavery and how to mitigate it in our own business and in our supply chain, there is always more that we can do. These will be our key areas of focus in the coming 12 months:

- Ensure that the objectives of the "People Matter Charter" around Modern Slavery continue to be fully integrated into our processes and those of our supply chain.
- Further our impact on this issue by working together with victim rehabilitation organisations and offering work opportunities in the construction industry to ex-victims of modern slavery through a Victim Re-integration Scheme.
- Modern Slavery specific KPIs and targets to be in place for 2025 and monitored on a quarterly basis by our Modern Slavery Working Group.
- Continue our participation in the Built Environment Against Slavery Working Group.
- Maintain our Business Partnership status with Stronger Together.

This statement covers the period 1 January 2024 to 31 December 2024 and has been given board approval on 28th March 2025.

Brusk Korkmaz

Chief Executive Officer
Hercules Site Services PLC