

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 has taken in 2018 to prevent slavery and human trafficking 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 construction, utilities and civil engineering organisation with high ethical standards and a passion for providing clients with a reliable service of the highest quality within the civil engineering industry, delivering labour supply and subcontract packages. The Hercules team prides itself on its community support, high moral values and integrity.

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 responsibly, particularly with regard to human rights issues and Hercules is certified to BES 6002 Certification Ethical Labour Sourcing with BRE Global. We will not tolerate human trafficking and 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](http://www.hercules-construction.co.uk) and are communicated to every employee upon joining the company and whenever any updates are made. Our relevant policies include:

- Anti-Slavery 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 Anti-Slavery Policy Statement, making its requirements a mandatory condition of employment.

## Risk Assessment

In March 2018 we conducted a risk assessment of our operations, identifying that the biggest exposure that we 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:

- Forced Labour
- Work and life under duress

This has enabled us 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 also considered the risks associated with sub-contractors and through our supply chain.

## Our People

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

- All employees are provided with information about their statutory rights, including sick pay, holiday entitlements, parental leave, flexible working and any other benefits to which they may be entitled.
- Hercules pays all of its employees at least the minimum living wage and we ensure that we comply with all legal requirements.
- All new employees are subject to rigorous pre-employment checks to ensure their right to work in the UK and to confirm their identity. This includes the employee being able to provide evidence that they are in possession of their own identification documents.
- We ensure that bank account details provided for the payment of salary match the name of the employee and where discrepancies arise we investigate and 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 for assessment. We also conduct 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 communicate awareness of the signs of modern slavery in the workplace, ensure every employee has access to helplines and information, and to conduct any necessary checks or investigations if any concerns have been raised.
- We have a confidential whistleblowing procedure. There were no reports of human rights, slavery or human trafficking via the whistleblowing process in 2018.
- 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.

## Due Diligence of Our Supply Chain

We conducted a 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.
- 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 comply with all applicable laws, statutes, regulations and codes.
- 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.

## 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.

- Hercules employees have access to e-learning modules on modern slavery via the Supply Chain Sustainability School, with which we are Partners and Gold Members.
- Awareness training on modern slavery is provided via tool box talks and briefings throughout the organisation.

## 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.

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.

### GLAA Construction Protocol

In 2018 Hercules signed up to 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

## Next Steps

- We plan to make modern slavery training mandatory for certain identified roles within the organisation.
- We will be rolling out further training for front line supervisors in the form of tool box talks and video training, promoting awareness of the typical signs of someone working in enslaved conditions. This training will also include how to report concerns either via the whistleblowing process or to Hercules leadership.
- We will also be further raising awareness of the modern slavery throughout the entire organisation via the company newsletter, posters on staff noticeboards, video training, tool box talks and briefings on site.

This statement covers the period 1 January 2018 to 31 December 2018 and has been approved by the Managing Director of Hercules Site Services Ltd.

Brusk Korkmaz  
Managing Director