



Hupsoo Ltd

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Modern Slavery and Human Trafficking Policy

Policy Statement

Hupsoo Ltd is committed to preventing modern slavery, forced labour, servitude, human trafficking and exploitation within our business operations and supply chains.

We operate with honesty, integrity and transparency and have a zero tolerance approach to any form of modern slavery or unethical treatment of workers.

As a UK based recruitment business supplying temporary and permanent workers across commercial, industrial, technical and engineering sectors, including food and beverage manufacturing and production, we recognise our responsibility to protect workers and promote ethical recruitment practices.

This policy applies to all employees, temporary workers, contractors, clients, suppliers and any other parties working on behalf of Hupsoo Ltd.

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms, including:

- Human trafficking
- Forced or compulsory labour
- Debt bondage
- Servitude
- Child labour
- Exploitation of vulnerable individuals

Modern slavery can occur in any industry and often involves the exploitation of workers through coercion, intimidation, deception or abuse of power.

Our Commitment

Hupsoo Ltd is committed to:

- Operating ethically and responsibly in all business relationships
- Complying with the Modern Slavery Act 2015 and all applicable UK employment legislation
- Providing fair recruitment practices and transparent working arrangements
- Protecting vulnerable workers from exploitation
- Ensuring all workers are free to leave employment voluntarily
- Promoting safe and respectful working environments
- Working only with clients and suppliers who share our commitment to ethical labour standards



Recruitment Practices

To help prevent modern slavery risks, Hupsoo Ltd will:

- Verify the identity and right to work status of all workers
- Ensure workers are recruited voluntarily and without coercion
- Provide clear information regarding pay rates, working hours and assignment details
- Ensure workers understand the terms of their engagement
- Never retain original identification documents belonging to workers
- Encourage direct communication with workers throughout assignments
- Monitor for indicators of exploitation or suspicious behaviour
- Maintain lawful payroll and payment practices

Responsibilities

Management Responsibilities

Management are responsible for:

- Ensuring compliance with this policy
- Promoting awareness of modern slavery risks
- Monitoring recruitment and supply chain practices
- Taking appropriate action where concerns are identified
- Supporting workers who may be vulnerable or at risk

Employee Responsibilities

Employees and representatives of Hupsoo Ltd are expected to:

- Act ethically and with integrity
- Remain alert to signs of exploitation or modern slavery
- Report concerns immediately
- Cooperate with investigations where required

Failure to comply with this policy may result in disciplinary action.

Identifying Risks

Examples of potential indicators of modern slavery may include:

- Workers appearing fearful, withdrawn or anxious
- Individuals being controlled or accompanied by another person
- Lack of access to personal identification documents
- Concerns regarding accommodation or transport arrangements
- Workers unwilling or unable to communicate freely
- Excessive working hours or unusual payment arrangements
- Signs of physical abuse, neglect or intimidation

Any concerns should be treated seriously and escalated appropriately.



Reporting Concerns

Any concerns relating to modern slavery, exploitation or unethical treatment must be reported immediately to management.

Reports will be treated confidentially wherever possible and investigated appropriately.

Hupsoo Ltd will not tolerate retaliation against anyone who raises genuine concerns in good faith.

Where necessary, concerns may be reported to relevant authorities, including:

- The Gangmasters and Labour Abuse Authority (GLAA)
- The Modern Slavery Helpline
- Law enforcement agencies

Supply Chain and Client Due Diligence

Hupsoo Ltd expects clients, suppliers and business partners to operate in accordance with ethical labour standards and applicable legislation.

We reserve the right to review, investigate or terminate relationships where concerns relating to modern slavery or worker exploitation are identified.

Training and Awareness

Hupsoo Ltd is committed to promoting awareness of modern slavery risks and ensuring relevant staff understand:

- How to identify warning signs
- How to report concerns
- The importance of ethical recruitment practices
- Legal responsibilities under the Modern Slavery Act 201

Policy Review

This policy will be reviewed regularly to ensure ongoing compliance with legislation and best practice.

Approved by:

Lauren Curtling
Director
Hupsoo Ltd

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