

Modern Slavery and Human Trafficking Policy

Hypori Ltd (UK)

23/05/2026

Owner: President

Document Revision History

Date	Version	Description	Author	Approval
23 rd May 2026	1.0	Creation of Modern Slavery and Human Trafficking Policy for Hypori Ltd ("Hypori").	Claire Robinson	28 th May 2026

1. Statement

Hypori Ltd (“**Hypori**”) is committed to conducting business ethically, responsibly and with integrity in all business relationships.

Hypori has a zero-tolerance approach to modern slavery, forced labour, servitude and human trafficking and is committed to acting professionally and ethically to minimise the risk of such practices occurring within its operations or supply chain.

Hypori does not currently meet the turnover threshold requiring publication of an annual Modern Slavery Statement under Section 54 of the UK Modern Slavery Act 2015.

Notwithstanding this exemption, Hypori maintains this Modern Slavery and Human Trafficking Policy as part of its commitment to ethical business conduct, responsible supplier management and compliance with public sector procurement expectations.

2. Scope

This Policy applies to:

- employees;
- contractors;
- consultants;
- temporary workers;
- suppliers; and
- other third parties engaged by Hypori.

3. Organisational Commitment

Hypori is committed to:

- maintaining fair and ethical business practices;
- complying with applicable employment and labour laws;
- promoting a safe, respectful and inclusive working environment;

- respecting fundamental human rights and ethical employment practices;
- avoiding knowingly engaging with organisations involved in modern slavery or human trafficking; and
- taking proportionate steps to assess and manage modern slavery risks within its supply chain.

Hypori expects all personnel and suppliers to uphold standards consistent with this Policy.

4. Supply Chain and Supplier Expectations

Hypori expects suppliers, contractors and business partners to:

- comply with applicable labour and employment laws;
- prohibit forced, bonded or compulsory labour;
- prohibit human trafficking and exploitation;
- provide fair and lawful working conditions; and
- operate ethical and responsible business practices.

Where appropriate and proportionate to the nature of the services provided, Hypori will consider ethical and compliance factors during supplier selection and engagement processes.

In practice, Hypori's approach to supply chain due diligence may include one or more of the following, proportionate to the risk profile and nature of the supplier relationship:

- review of supplier ethical and compliance representations during procurement;
- inclusion of modern slavery and ethical conduct obligations in supplier contracts where appropriate;
- consideration of publicly available information regarding supplier ethical standards; and
- periodic review of key supplier relationships as part of Hypori's vendor management process.

5. Reporting Concerns

Any employee, contractor or third party who becomes aware of, or suspects, potential modern slavery, forced labour or unethical conduct associated with Hypori's operations or supply chain is encouraged to report concerns through appropriate management or governance channels.

Concerns should be raised in the first instance with a line manager or, where that is not appropriate, directly with the President, jim.cushman@hypori.com.

Hypori is committed to ensuring that anyone who raises a concern in good faith under this Policy will not suffer any detriment, disadvantage or unfair treatment as a result of doing so. Reports may be made anonymously where the individual prefers.

All concerns raised will be treated seriously and investigated appropriately.

6. Responsibility and Governance

Overall responsibility for this Policy rests with the [senior management team](#) of Hypori. Management is responsible for:

- promoting awareness of this Policy;
- encouraging ethical business conduct;
- reviewing any concerns raised under this Policy; and
- reviewing this Policy at least annually to ensure that it remains appropriate to the organisation's operations and risk profile.

7. Training and Awareness

Hypori will take proportionate steps to ensure that relevant personnel are made aware of this Policy and of Hypori's zero-tolerance approach to modern slavery and human trafficking. This may include communication during onboarding, periodic policy reminders, and making this Policy available to all relevant personnel and suppliers upon request.

8. Review

This Policy will be reviewed at least annually and updated where appropriate to reflect changes in legal, regulatory or operational requirements.