

# Imperial

SINCE 1994

## **Modern Slavery Statement & Policy**

### **Imperial Polythene Products Limited**

**Financial Year: 2025/2026**

#### **1. Introduction**

Imperial Polythene Products Limited (“the Company”) is committed to preventing modern slavery, servitude, forced or compulsory labour, and human trafficking in all parts of its business and supply chains. Although the Company’s annual turnover is below the £36 million threshold and it is therefore not legally required to publish a Modern Slavery Statement under section 54 of the Modern Slavery Act 2015, we voluntarily adopt this statement and policy to demonstrate our commitment to ethical and transparent business practices.

#### **2. Our Business & Structure**

Imperial Polythene Products Limited manufactures and supplies polythene products within the UK. We operate from multiple warehouse and storage locations to ensure business continuity and secure supply for our customers. The Company employs staff across production, warehousing, logistics, administration, and management.

#### **3. Our Commitment**

We have a zero-tolerance approach to modern slavery and human trafficking. We expect the same high standards from all employees, suppliers, contractors, business partners, and any third parties who work with us.

This commitment is upheld through:

- Our Anti-Slavery and Human Trafficking Policy,
- Our supplier vetting and due-diligence processes, and
- Mandatory documentation checks for the right to work.

#### **4. Steps Taken to Prevent Modern Slavery in Our Business and Supply Chain**

To reduce the risk of modern slavery, we have implemented the following measures:

##### **4.1 Worker Verification**

- We verify the identity, eligibility, and right-to-work documentation for all employees and agency workers.
- We operate a strict Border Agency compliance checklist for all new starters.
- All documentation is reviewed to ensure legitimacy, preventing illegal working or human trafficking risks.

# Imperial

SINCE 1994

## 4.2 Supplier & Contractor Due Diligence

- All suppliers must confirm that they do not engage in modern slavery or human trafficking.
- Where a supplier is found to breach these standards, the Company will immediately terminate its commercial relationship.
- We reserve the right to request evidence of suppliers' ethical labour practices.

## 4.3 Training & Awareness

- Although not legally required, internal awareness is supported through our Anti-Slavery Policy and management oversight.
- Key staff involved in recruitment, procurement, and supply chain management are instructed to identify warning signs of exploitation.

## 4.4 Reporting & Whistleblowing

- We encourage staff to report any concerns via their line manager or under our Disclosures in the Public Interest (Whistleblowing) Policy.
- No employee will suffer any detriment for raising concerns in good faith.

## 4.5 Ongoing Monitoring

- The Production Manager, under oversight of the Board, is responsible for ongoing monitoring of policy effectiveness and supply chain ethical compliance.
- Our Board reviews this policy annually.

## 5. Zero-Hours Contracts & Fair Pay

Imperial Polythene Products Limited **does not use zero-hours contracts** under any circumstances.

All employees are engaged on contracted hours that provide stability, predictability, and fair working conditions. The Company is committed to fair employment practices and pays the **Living Wage** to all employees, ensuring that no worker is placed at financial disadvantage or risk of exploitation.

## 6. Responsibilities

- The **Board of Directors** holds overall responsibility for compliance with this policy.
- The **Production Manager (Lukasz Kuzma)** is responsible for day-to-day implementation, investigation of concerns, and auditing compliance.
- All staff and managers must ensure they understand and follow this policy.

## 7. Breach of the Policy

Any employee found to be involved in modern slavery or human trafficking will face disciplinary action, up to and including **summary dismissal for gross misconduct**.

Any supplier or contractor found to be in breach of this policy or engaging in modern slavery practices will have its contract **terminated immediately**.

## 8. Approval

This statement has been approved by the Board of Directors and will be reviewed annually.



**Signed: Mohit Bhalla**

**Position: Finance Director**

**Date: 2.12.25**