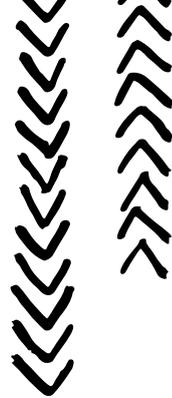


# Our Code of Conduct

Building  
*trust* and  
confidence  
for all our  
stakeholders



# At Emperor, we're specialists in corporate reporting, brand, employee experience, sustainability and digital communications.



Over the past 25 years, we've grown to become one of the UK's leading independent strategic and creative corporate communications agencies.

We are building a strong community where people are respected, supported, cared for and recognised. A community that generates trust and confidence among all our stakeholders and throughout our value chain.

We always aim high, and this Code of Conduct lays out the standards we expect colleagues and suppliers to meet or exceed, and outlines what our clients can expect from us.

Our efforts to achieve more for ourselves and our clients is at the core of our values. We approach everything with fresh thinking and positivity, share our skills and experience at every opportunity, and expect our people and suppliers to be commercial, focused and agile.



## *Our purpose, vision & mission*

**Our purpose** is to generate trust and confidence for our clients' stakeholders

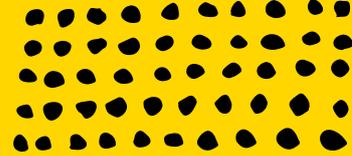
**Our vision** is to be the partner of choice for ambitious clients and people

**Our mission** is to bring clarity, creativity and consistency to communications

## *Our values*

- Aim high**
- Infectious enthusiasm**
- Always learning**
- Creativity everywhere**
- Razor sharp**





We have 12 pledges – a set of commitments that focus on the issues we are passionate about and reflect how we behave. They are visible inside and outside our business, and are an integral part of our culture. When we say, ‘We look after the whole you’, ‘We care for the environment’ or ‘We will support you through thick and thin’, we mean what we say. And we expect the same from everyone we work with.

Our culture is founded on the idea of delivering exceptional work and a great experience for everyone involved, while creating a positive impact, and doing some good along the way.

We’re not just employee-owned, we are employee-powered for a sustainable future. We believe our partnership model and mindset will ensure the business remains strong long into the future. And that gives us a clear advantage in attracting the most talented people in our industry.

## Employee-owned

In 2020, we became an employee owned business. As one of the first of our kind to take this step, we believe the decision provides long-term clarity and reinforces our desire to remain an agile and people-focused business.



## Our pledges

These are Emperor’s 12 commitments to our people, society and planet:



**WE GIVE BACK**



**WE GIVE YOUTH A CHANCE**



**WE ARE MOST WELCOMING**



**WE HELP YOU GO BEYOND YOUR POTENTIAL**



**WE TRUST**



**WE LOOK AFTER THE WHOLE YOU**



**WE ARE ALWAYS ACCESSIBLE**



**WE ENCOURAGE INNOVATION AND IDEAS**



**WE RECOGNISE EXCELLENCE**



**WE ARE SOCIAL**



**WE WILL SUPPORT YOU THROUGH THICK AND THIN**



**WE CARE FOR THE ENVIRONMENT**

# Building trust and confidence



## For our suppliers

At Emperor we enjoy working with suppliers who bring their expert services and unique abilities to what we do. It's an important part of how we operate, and we have rigorous processes in place for selecting these suppliers and reviewing our relationships along the way.

We expect all our suppliers to share our commitment to the welfare of their people, to act with honesty and integrity at all times, and to manage their businesses ethically and responsibly. That means creating a fair and supportive workplace and, of course, taking a zero tolerance approach to any form of modern slavery.

We look for suppliers who show leadership in all areas of corporate responsibility. This includes the way they act to protect the environment and demonstrate sustainability across their operations. In turn, we forge strong relationships with our suppliers and help them to work ethically and safely, while making full use of their resources both responsibly and efficiently.

## See our topics and policies:

BUSINESS ETHICS	P6
CYBER SECURITY & DATA PROTECTION	P8
EQUALITY, DIVERSITY & INCLUSION	P9
ENVIRONMENT	P9
INSIDER TRADING	P7
LABOUR STANDARDS	P7
WHISTLEBLOWING	P6





## For our people

As an employee owned business, it will come as no surprise that our people are our greatest asset. Together we collaborate to create strategic and creative communications solutions for our clients, build our business and help each other grow professionally.

We take pride in cultivating a culture that's not just challenging and rewarding, but is also equitable, diverse and inclusive for all colleagues. We insist on high standards, whether that's in confidentiality, dealings with clients, respect for others, handling any potential conflicts, or reporting illegal activities.

At Emperor, we're also 100% committed to ensuring the health, safety and welfare of our people. We go beyond all relevant legislation and consider our colleagues' holistic health. We offer all of our employees a range of free exercise and meditation classes, as well as run regular mental health initiatives. Our people also understand their legal responsibility to take care of their own health, safety and welfare at work, as well as that of any colleagues who may be affected by what they do.



## For our clients

We're here to support our clients with specialist advice and expertise, and to provide them with access to creative and strategic services that are delivered by some of the very best people in the business.

We work with pride and integrity - confident that what we do matters. That's the least our clients expect from us, and the business standards we set ensure that we generate trust and confidence in everything we do.

That's why our clients can be sure their data is safe with us, they can trust us to keep their information confidential. They can also have confidence that we will always do the right thing, in line with our values and the pledges we've made.

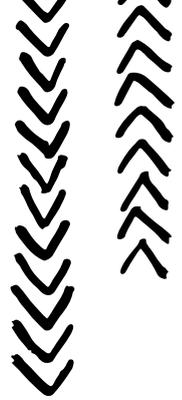
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# Topics + policies



## Business ethics

**At Emperor, we uphold the highest professional and ethical standards and practices. Our sourcing strategy prioritises and favours suppliers that share our commitment to doing the right thing, every time.**

- We don't give or accept gifts or hospitality, other than token gifts, from any person or business we are involved with on Company business.
- Company hospitality aimed at thanking clients and suppliers for their custom and loyalty must have the approval of a director.
- No Company donations should be made to any charities, political parties or other organisations without the approval of a director.
- Our people may not hold or deal in any shares or securities in any company that Emperor works with (or has worked with recently) unless they have the express approval of a director.
- Careful selection of suppliers is carried out to ensure that our ethical criteria are met and will be maintained throughout our relationship.

## Whistleblowing

**While we strive to make sure all our policies are implemented effectively and adhered to, we know that things can sometimes go wrong. We have created robust systems and processes to prevent this, and to deal with it swiftly and fairly if the worst happens.**

- Our Whistleblowing procedure allows our people, suppliers or other stakeholders to raise serious concerns about wrongdoing in the workplace directly to Emperor in strict confidence.
- Those concerns may relate to other employees and/or a service provision at Emperor that may have an impact on the wider public interest.
- Our dedicated whistleblowing email (speakup@emperor.works) is monitored daily.
- Any concern raised will be given serious consideration, and addressed fairly, quickly and effectively in line with our procedure.
- UK legislation makes it unlawful to dismiss, discipline or victimise a worker who has made a 'protected disclosure' in the public interest.

### Relevant policies:

EMPEROR ANTI-BRIBERY POLICY

EMPEROR SUPPLIER SELECTION POLICY

EMPEROR UK EMPLOYEE HANDBOOK

- 13.2 Ethical business conduct
- 13.5 Share dealings in client companies

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## Employee conduct

**Our Employee Handbook sets the behaviours and attitudes we expect of our people. We each have a responsibility to act with integrity, protect confidential information, treat others with respect, and demonstrate fairness at all times.**

- That means living Emperor's values and making good on our pledges – all of which are outlined on the first page of this Code of Conduct.
- It also means supporting – as per the Equality Act – the principle of equal opportunities in employment and opposing all forms of discrimination on the grounds of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- Harassment, bullying or discriminatory behaviour will not be tolerated and may result in disciplinary action, up to and including dismissal.
- Personal relationships between a line manager and an employee sometimes develop, and this may lead to perceived (or actual) conflicts of interest. Such a relationship should be declared to HR and failure to do so may result in disciplinary action.

## Labour standards

**At Emperor we work hard to create a fair working environment for our people. We are committed to acting ethically and with integrity and transparency, and expect those we work with to maintain strong labour practices throughout our value chain.**

- Our suppliers must respect the human rights of their employees and everyone who works in their own supply chain.
- Emperor has a zero tolerance approach to any form of modern slavery, which encompasses slavery, servitude, human trafficking, child labour and any other forced labour.
- We continue to put effective systems and controls in place to safeguard against any form of modern slavery taking place in our business or supply chain.
- We conduct due diligence on all suppliers, including an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery.
- We hold regular training for our procurement and buying teams, so that they can identify the signs of modern slavery and know what to do if they suspect it is taking place within our supply chain.
- Emperor is a proud member of the Living Wage Foundation.

## Insider trading

**The nature of our work gives us access to confidential information that is not available to the public. If disclosed, this information could be useful to our clients' competitors or damaging to us or our clients.**

- It is our duty to protect any confidential, 'insider' or other sensitive information related to Emperor and current, former, and prospective clients.
- Such information must not be used to further the interests of an individual or company, as this would violate applicable insider trading regulations.
- Anyone with access to unpublished price sensitive information relating to Securities of clients is prohibited under the Company Securities (Insider Dealing) Act 1985 from dealing in such securities, or passing on this information to any other person.

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## Cyber security and data protection

**Holding client, employee and supplier data is a huge responsibility and has to be managed tightly within increasingly complex legal frameworks. Our Information Systems Security Policy sets out how we reduce the risk of cyber attacks to provide privacy and security for our employees and all third parties that we work with.**

- We have strict policies and procedures in place to ensure that the data we hold is held securely at all times, and that we use it correctly.
- We treat our employees' personal data in confidence and will not disclose it to third parties unless this is necessary and connected with an individual's employment, is otherwise permitted by law, or where someone has given their consent.
- We use the internet effectively and efficiently, to protect the integrity of data and systems. Improperly accessing offensive material is likely to be classified as gross misconduct and can lead to summary dismissal.
- Sharing user-IDs and passwords is strictly forbidden, as is the use of unauthorised instant messaging systems or social networking sites.
- We all need to be alert to the possibility that emails containing viruses may arrive in our inboxes, and detailed guidance on email attachments is supplied to all employees.

## Health, safety and wellbeing

**The health, safety and wellbeing of everyone who works for us directly, or through one of our suppliers, is hugely important to us. We expect all companies we work with to play their part in preventing accidents and supporting the health of everyone involved.**

- We continually monitor and review our processes to improve our management of health and safety.
- We ensure there are sufficient people trained in first aid and mental health first aid in the event of medical emergencies.
- Whenever an accident occurs in one of our workplaces or elsewhere in work time, we expect colleagues to contact a first aider for treatment and record the details within the Accident Book.
- Our Employee Assistance Programme is available 24/7/365 to our people and their immediate family to help with family matters, financial, relationships, legal, work, drugs and alcohol, stress, housing and consumer issues. Call anytime on 0117 934 0456.
- Emperor supports mental health awareness and combats the stigmas associated with it. We also host training sessions and discussions led by our Mental Health First Aiders and offer a range of helpful resources.

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## Equality, diversity & Inclusion

**Emperor aims to create an environment that respects our people's diversity, enabling them to achieve their full potential and to contribute fully in their roles. We expect our people and the suppliers we work with to embrace this and help us to make it happen.**

- Emperor's Board has overall responsibility for ensuring that we operate within a framework of equality of opportunity across our business and value chain.
- We also have an Equality, Diversity & Inclusion (EDI) Committee made up of volunteers from across the business to develop Emperor's EDI strategy and run regular initiatives and training.
- We each have a duty to play our part in upholding the principles contained in our Equality, Diversity and Inclusion Policy.
- We deplore all forms of bullying and harassment, and we expect all colleagues and partners to support us in ensuring that bullying and harassment never occur in our workplaces.
- Emperor also has clear obligations towards all its employees and the community at large to ensure that people with disabilities are afforded equal opportunities to join us and progress their career.
- And when employees become disabled in the course of our employment, we will take reasonable steps to make adjustments to their existing role if needed or redeploy them with appropriate retraining to another role wherever possible.

## Environment

**We believe Emperor can play a significant role in addressing the climate emergency through the work that we do. As strategic sustainability and ESG (environmental, social and governance) advisors to many UK and multi-national businesses, we collaborate with them to create effective strategies and stakeholder communications that drive positive impact for society and the planet.**

- As an employee owned business, we are ideally placed to raise awareness and take action to address the direct and indirect impacts of our operations, in our supply chain and at home.
- We are committed to ensuring that we comply with all relevant environmental legislation and meet all our contractual obligations, and we select and work with suppliers that also operate with the highest sustainability credentials.
- We monitor our environmental performance and review our processes and policies to ensure there is continuous improvement.
- As part of this, we work to reduce our direct emissions and support our suppliers to reduce emissions across our value chain.
- We minimise the waste we produce, and ensure that any waste generated by our business is managed effectively and disposed of safely.

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## Questions?

For more information or any questions you may have about the content of this document, please contact:

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