



Emperor

Modern Slavery Statement

January 2022

emperor

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Introduction

Emperor is one of the largest independent strategic and creative corporate communications agencies in the UK. We specialise in brand, sustainability, employee engagement and stakeholder disclosure across all forms of media from digital and print, to film and presentations. We are an employee-owned business with over 240 talented partners supported by an established roster of freelancers and fixed-term contractors who return year-on-year during our busiest season. Over our 25-year tenure, we have established a network of trusted suppliers without whom we couldn't provide a complete service to our clients. In 2017 we launched our 12 pledges, a series of social and environmental commitments, and in April 2021 we updated our Articles of Association to demonstrate our commitment to creating value for all our stakeholders including employees, suppliers, clients, communities and the environment.

Why this policy is important

Modern slavery, forced labour, forced marriage and human trafficking continue to be a major issue around the globe; often hidden from sight and hard to detect, this phenomenon exists as much in the 21st century as it did hundreds of years ago. This fundamental issue continues to grow as a cycle of fear, deception and exploitation makes it difficult, even for local employers, to detect. The COVID-19 crisis has exacerbated underlying factors that can make people vulnerable to modern slavery, including poverty, financial insecurity, lack of mobility caused by local or national shutdowns, and supply chain and logistics challenges due to changes in demand.

The statistics are staggering:

- At any given time in 2016, an estimated 40.3 million people were in modern slavery, including 24.9 million in forced labour and 15.4 million in forced marriage.
- It means there are 5.4 victims of modern slavery for every 1,000 people in the world.
- One in four victims of modern slavery are children.
- Out of the 24.9 million people trapped in forced labour, 16 million people are exploited in the private sector such as domestic work, construction or agriculture; 4.8 million people in forced sexual exploitation, and 4 million people in forced labour imposed by state authorities.
- Women and girls are disproportionately affected by forced labour, accounting for 99% of victims in the commercial sex industry, and 58% in other sectors.

Source: [Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, ILO, Geneva, September 2017.](#)

Our policies

Through our policies we communicate our values and expectations, setting a high bar for ourselves and our supplier partners and making clear that we do not tolerate modern slavery. We are committed to consistently evolving and improving our approach. We regularly review our policies to identify areas for update and improvement.

Related policies:

- Code of Conduct – an overview of our values, approach and key policies for suppliers, clients and employees.
- Sustainable Procurement – including the criteria to look for in our suppliers to ensure we are supporting and driving a sustainable economy.
- Environmental Purchasing – outlining the choices that should inform our purchasing of products.
- Anti-bribery and Corruption – defining ethical business practices.
- Data and Information Security – determining the responsible management of data and information in line with ISO27001.

Our principles in regard to modern slavery

We strive to ensure the services we provide are delivered in a way that respects internationally recognised human rights, including the right to freely choose employment. We do not tolerate the use of child labour, forced labour or human trafficking in any form – including slave labour, prison labour, indentured servitude, or bonded labour – in our operations or value chain.

Emperor is a proud member of the Living Wage Foundation. Along with the other 7,000 UK businesses which are members, Emperor believes that a hard day's work deserves a fair day's pay and that everyone should have a wage that means everyday needs can be met.

About our supplier network

Our suppliers fall into two main categories: those providing goods and services that we use to run our companies such as IT, travel, telecommunications, professional services and facilities; and those providing services used in client work, such as print, video production and market research.

Taking a proactive approach

During 2021, we began a programme of work with the aim of increasing our use and procurement of socially impactful and environmentally preferable products and services in our shared workplaces by making informed decisions and actively shaping our supply chain.

In May, we undertook our third annual supplier review process and introduced a set of sustainability criteria, which has been consolidated as a Sustainable Procurement Policy.

In September, we published an updated Code of Conduct with suppliers, clients and partners in mind, which outlines our values and provides an overview of key policies.

In November, we conducted our first supplier survey informed by best practice screening criteria detailed in B Corp's Impact Assessment (BIA). The questions focussed on suppliers' approach to governance, and how they are addressing environmental and social issues.

Supplier selection and screening criteria include, but are not limited to:

1. Respect the human rights of their own employees and those in their supply chain.
2. Act with honesty and integrity, managing their business ethically and responsibly.
3. Comply with legislation and regulations.
4. Manage and reduce their impact on the environment.
5. Proactively support the development of an inclusive workplace and a diverse workforce.

The survey and our Code of Conduct were sent to 139 of our suppliers, which equals more than 80% of our procurement spend.

As of December 2021, we have received 53 responses. Our goal during the first half of 2022 is to determine a clear vision of the supply chain we want to have and ensure we have the tools and processes required to help us achieve this.

Our next steps are to:

- Follow up and engage directly with suppliers who have not completed the survey prioritising those who account for our most significant spend.
- Analyse the survey data to establish a clear view of our suppliers.
- Develop and publish targets that will help us to model the shape of our supply chain.
- Determine if any actions need to be taken and liaise with suppliers accordingly.

Engaging our employees

We set a high bar for ourselves and our suppliers. As set out in our Code of Conduct, our supply chain standards are grounded in principles of value creation for stakeholders, inclusivity, transparency and accountability.

At Emperor we understand the importance of, not only having good policies in place but also, upholding the undertakings within them. Amongst our own employees, freelancers and contractors, we encourage good practice through our onboarding processes, ongoing internal communications and training including:

1. Embedding into onboarding and induction/training sessions.
2. Targeted team discussions for those key to implementing the related policies and processes.
3. Timely company-wide education and engagement campaigns.
4. All agency posts on our intranet and email pointing to any important updates.

Governance and due diligence

We are continuing to embed our approach within our teams and to establish the necessary systems:

- New suppliers will receive our survey and Code of Conduct.
- Existing suppliers who have completed the survey and meet expectations will be surveyed bi-annually.
- Suppliers who do not have policies in place or fall below expectations will be offered support and guidance to improve standards within six months with the emphasis on them reporting back to Emperor. If standards still fall below expectations, the supplier is referred to our Executive Chair, Group Chief Financial Officer and relevant Relationship Managers for review. Persistent non-improvement will lead to the supplier being removed from our system.

Looking forward we undertake to monitor our approach to supply chain standards on an ongoing basis as we seek to embed our policies and processes. We will also review against best practice, such as B Corp's guidance, annually or sooner if in line with any significant developments.

Contact details

We welcome feedback and please direct any questions to:

- Kingsley James, Executive Chair
- Simon Newton, Group Chief Financial Officer
- Lynn Dickinson, Responsible Business Director