

April 2026

Emperor Modern Slavery Statement



About Emperor

Emperor is one of the UK's largest independent strategic and creative corporate communications agencies. We specialise in brand, sustainability, employee engagement and stakeholder disclosure, delivering work across every medium, from digital and print, to film and presentations.

We are an employee-owned business with over 300 talented partners supported by an established roster of freelancers and fixed-term contractors who return year-on-year during our busiest season. Over our 30-year tenure, we have established a network of trusted suppliers without whom we could not provide a complete service to our clients.

In 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. We are committed to using the power of business to build a more inclusive and sustainable economy.

For more information about Emperor and our approach to responsible business, please see our [Annual Reports](#).

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 statistics are staggering:

- At any given time in 2021, an estimated 49.6 million people were in modern slavery, including 27.6 million in forced labour and 22 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 27.6 million people trapped in forced labour, 17.3 million people are exploited in the private sector such as domestic work, construction or agriculture; 6.3 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 2022](#).

Our vision: Positive partners and purchases

Our purchases, partners, suppliers, and customers are all part of a chain that links us to the world. This reflects who we are and what matters to us. **Our vision is to be part of a supply chain that is as ambitiously positive, resilient, collaborative, and responsible as we aspire to be.** That is why with every decision we take and every connection we make, sustainability should always be at the forefront of our thinking.

Key initiatives

Since 2021, we have been delivering a programme of work designed to increase our use and procurement of socially impactful and environmentally preferable products and services. By making informed procurement decisions and actively shaping our supply chain, we have implemented the following key initiatives:

- Introduced a set of sustainability criteria, which has been consolidated as a Sustainable Procurement Policy.
- Published an updated Code of Conduct with suppliers, clients and partners in mind, which outlines our values and provides an overview of key policies.
- Created our Supply Chain Vision Statement as an important internal engagement tool.
- Developed and delivered training for relationship managers, including a presentation and supporting tools to guide the supplier review process.
- Conducted annual supplier surveys informed by best practice screening criteria. The questions focused 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.
- Strengthened supplier evaluations by equipping relationship managers to collect data aligned to our ESG criteria and assign a score out of 13.
 - Enhanced our supply chain mapping by gathering information about suppliers, including their geographical location, the sectors in which they operate, the percentage of spend on each sector, and any accreditations they may hold. This provides a more comprehensive view of our supply chain.
 - Expanded the scope of our annual supplier reviews, covering 80% of top spend in 2022 and increasing to 90% from 2023.

Governance

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

- New suppliers will receive our Supplier Review Form and Code of Conduct.
- Existing suppliers who meet expectations will be reviewed annually.
- Suppliers who do not have policies in place or fall below expectations will be offered support and guidance to improve standards within 6-12 months depending on the level of severity of the issue.
- If standards still fall below expectations, the supplier is referred to our 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. We will review it against best practice annually, or sooner if significant developments arise.

Supply Chain Programme Governance Structure

The supply chain programme governance structure below reflects the structure during FY24/25.

Philip Franklin – Chief of Staff & Director	- Management of risk register and review of Supply chain risks.
Georgia Mitchell – Deputy Company Secretary & Compliance Assistant	- To ensure compliance with relevant regulations and policies. - Management of processes and policies. - Oversight of risk register and review of Supply chain risks. - Management of information, communications and approvals required from the Board and Senior Management.
Simon Newton – Group Chief Financial Officer	- Oversight of the Supply Chain Management Programme and drive continuous improvement. - To approve and oversee processes and policies. - To review suppliers that fall below expectations. - Removal of suppliers who do not improve in line with Emperor's requirements.
Sarah Edwards – Head of Finance	- Oversight of embedding processes. - To work closely with Relationship Managers to support the onboarding process for suppliers. - Collecting information from Relationship Managers on any new supplier relationships, including reviews. - Ensuring that Relationship Managers are undertaking the review process with suppliers prior to adding the supplier to our internal systems.
Relationship Managers	- Responsible for undertaking the Supplier Review process with their suppliers to score them against the set of criteria.

	<ul style="list-style-type: none"> - Responsible for sharing the Code of Conduct with their suppliers. - Responsible for ensuring that all Freelancers/ Sole Traders sign up to our Code of Conduct. - To screen new suppliers against the criteria to ensure suitability through our onboarding process. - Liaise with the Finance team to support the data collection process. - Continuously review supplier relationships to ensure the highest standards are being met. - Responsible for onboarding of suppliers and using the review criteria.
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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 have a zero-tolerance approach to 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. All suppliers are now required to sign up to our Code of Conduct.
- Sustainable Procurement Policy – including the criteria to look for in our suppliers to ensure we are supporting and driving a sustainable economy.
- Environmental Purchasing Policy – outlining the choices that should inform our purchasing of products.
- Anti-bribery, Fraud and Corruption policy and training – defining ethical business practices.
- Data and Information Security – determining the responsible management of data and information in line with ISO 27001.
- Speak Up Whistleblowing Policy – for partners concerned about behaviours in the workplace and in our supply chain.
- Health and Safety Policy – sets out our approach to maintaining a safe and healthy working environment for all.

Our Supply Chain

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

About our top 90% supplier spend

Sectors that our suppliers come from	Percentage of spend on each sector	Geographical location	External Accreditations
55% Freelancers	28% Freelancers	81% are based in the UK	62% of these suppliers hold an external accreditation such as an ISO certification
15% Professional services (including legal/accountancy)	22% Professional services (including legal/accountancy)	19% are based outside of the UK	
8% IT/Technology services	13% IT/Technology services		
8% Support services (including digital and video production)	14% Support services (including digital and video production)		
5% Print	10% Print		
5% Benefit Providers	5% Benefit Providers		
3% Utilities	8% Utilities		

Note: 49% of our suppliers from FY23/24 have remained in our top 90% spend in FY24/25.

Through our Supply Chain Programme, we aimed to review 90% of our procurement spend, covering more than 220 suppliers - a 23.2% increase in number from FY23/24. This data allowed us to determine which suppliers align with our values and to flag any high-risk suppliers who fall below our requirements. An annual review of our suppliers also gives relationship managers an opportunity to consider the value and quality of the goods and services provided via an internal assessment.

This annual process requires that suppliers with more than five employees be assessed against our internal criteria as outlined below. Suppliers with fewer than five employees are required to sign up to our Code of Conduct and Emperor's values. Where a supplier was reviewed in full in the previous year, there is only a requirement to complete an internal assessment of value and quality so that the full review process takes place biannually. Critical suppliers may be required to undertake the full review each year if deemed appropriate.

The thirteen sustainability criteria fall into three buckets: Ethics and the Environment, People and Society and Governance and Assurance. To date, 64% of internal and full reviews have been completed so far and the results can be seen below:

- 26% of suppliers scored 13 out of 13
- 21% scored 12 out of 13
- 7% scored 11 out of 13

In relation to the assessment criteria introduced in FY23/24 on whistleblowing and information security, the following results were recorded from completed reviews:

- Whistleblowing Policy in place – 82%
- Information Security Policy and Compliance with ISO 27001 or equivalent in place – 88%

We determined that there were no high-risk suppliers within our 90% biggest spend. However, we will continue to monitor these numbers, keeping an open dialogue with all our suppliers and identify areas for improvement.

Assessing and managing risk

This year, we continued to embed our set of criteria into our onboarding process of new suppliers. Relationship Managers and the Finance Team play a key role in the process, ensuring that every supplier we work with meets our requirements, and to put plans in place for any who do not.

To assess and manage these risks, we reviewed our current suppliers against criteria described in our Sustainable Procurement Policy, resulting in a score for that supplier. A low score does not mean that we will not work with the new supplier, but we will seek a commitment to improve their score within 12 months of the start of our relationship. Suppliers accounting for 90% of our expenditure will be reviewed at least biannually and, in most cases, annually, with coverage increasing over time as we onboard new suppliers using our review criteria. The Finance Team meet with Relationship Managers, as required, to ensure information is being kept up to date.

Given the nature of our business, our supply chain and the review processes we have undertaken, we believe that the risk of modern slavery in our supply chain is currently low. We have found no evidence of modern slavery in any of our suppliers through our review and onboarding processes. In 2025, no incidents of modern slavery or human trafficking were reported through our Speak Up initiative. However, we acknowledge that modern slavery and human rights breaches can be difficult to detect, and we remain committed to strengthening our processes to ensure that we identify and respond to emerging risks.

We also recognise that certain regions and sectors present potentially higher levels of risks due to the prevalence of low-paid and migrant workers. Through our review process of our top 90% of our supplier spend, we have identified that we have eighteen suppliers in a high-risk country (United Arab Emirates), which is an increase from five in FY23/24. This rise reflects our expanding presence in the region, including three offices and a 44% increase in revenue compared with FY23/24. We also have one supplier in the domestic industry (cleaning services) which is a high-risk sector. We aim to prioritise suppliers in high-risk sectors and regions, even if they sit outside of our top 90% expenditure in line with our ambition to increase the scope of the programme.

Engaging our employees

We set a high standard for ourselves and our suppliers. As outlined 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:

- Inclusion in onboarding and induction/training sessions.
- Targeted team briefings and discussions for those who are key to implementing the related policies and processes.
- Timely company-wide education and engagement campaigns.
- Guest speaker sessions led by organisations working to combat modern slavery — for example, [Justice for Care](#), who visited us in February 2025.
- Intranet and email updates directing employees to important policy developments and resources.

The effectiveness of our approach

We are continuously working to improve our approach to how we manage our supply chain and tackle modern slavery. We know that modern slavery, though prevalent, can be difficult to detect and we must continue to strengthen our policies and processes to best position ourselves in identifying and preventing modern slavery.

Looking forward

As we move into 2026, we endeavour to:

- Publish and make our preferred suppliers list available to all employees.
- Continue to work with any low scoring suppliers identified through our onboarding and review processes.
- Continue raising awareness with employees, promoting our commitment to working with sustainable partners.
- Review our supply chain on an ongoing basis, focusing on maintaining relationships with suppliers who meet the criteria set out in our Sustainable Procurement Policy.
- Launch our new training module on Modern Slavery to further assist employees in detecting any signs of Modern Slavery within our supply chain.

Governance and approval

This statement has been approved by Emperor's Board of Directors.



Victoria Sugg
CEO