

Our Code of Conduct

emperor

**Building trust
and confidence
for all our
stakeholders**

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

Our purpose

To generate trust and confidence for our clients' stakeholders

Our vision

To be the partner of choice for ambitious clients and people

Our mission

To bring clarity, creativity and consistency to communications

Over the past 30 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 values

- We're in it together
- We own it
- We aim higher
- We find a smarter way



We're proudly 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.

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:

5	Business ethics
5	Whistleblowing
6	Employee conduct
6	Labour standards
6	Insider trading
7	Cyber security and data protection
7	Health, safety and wellbeing
8	Equality, diversity and inclusion
8	Environment

Building trust and confidence continued

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 regularly run initiatives that promote mental and physical wellbeing, and we provide all employees with free financial wellbeing sessions. 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.

See our topics and policies:

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8	Environment

Topics and 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.

Relevant policies:

Anti-bribery, fraud and corruption policy

Sustainable procurement policy (supplier selection)

Partner handbook (employee)

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

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:

Anti-bribery, fraud and corruption policy

'Speak Up' whistleblowing policy

Sustainable procurement policy (supplier selection)

Partner handbook (employee)

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

Topics and policies continued

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 commitments - all of which are outlined on page two 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.

Relevant policies:

'Speak Up' whistleblowing policy

Partner handbook (employee)

- 13.14 Equality, diversity and inclusion

Bullying and harassment policy

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 their 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.

Relevant policies:

Anti-bribery, fraud and corruption policy

Modern slavery statement

Sustainable procurement policy (supplier selection)

Partner handbook (employee)

- 13.2 Ethical business conduct

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.

Relevant policies:

Partner handbook (employee)

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

Material non-public disclosure information policy

Topics and policies continued

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. Our Data Protection Policy explains how Emperor manages personal data in line with UK GDPR, the DPA 2018, PECR, and the DUAA 2025.

- We have strict policies and procedures in place to ensure that the data we hold is held securely at all times, used correctly, and destroyed in line with our policies.
- We are ISO 27001 certified, ensuring our information security framework meets internationally recognised best-practice standards.
- 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.
- We expect our Partners to follow all guidance relating to sharing sensitive files externally.

Relevant policies:

- Data protection policy
- Data security handbook
- Information security policy
- Document retention policy

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.
- We are committed to keeping everyone safe in the event of a fire. All fire safety equipment is regularly audited, and fully compliant with current regulations. Trained fire marshals are in place across all offices to ensure clear procedures, swift action, and peace of mind for our teams and visitors.
- 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.

Relevant policies:

- Health and safety policy
- Sustainable procurement policy (supplier selection)
- Partner handbook (employee)
 - 11.0 Health and safety

Topics and policies continued

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.
- Emperor has three active Employee Resource Groups—Neurodiversity (Neurospicy Network), LGBTQ+ (Penguins and Proud) and Women (The Women's Collective)—led by Partners across the business. Each group focuses on raising awareness, celebrating key milestones, advocating for change and sharing best practice within their communities.
- 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.

Relevant policies:

Sustainable procurement policy (supplier selection)

Partner handbook (employee)

- 13.14 Equality, diversity and inclusion

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 are ISO 14001 certified, demonstrating our commitment to effective environmental management and continual improvement.
- 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.

Relevant policies:

Environmental policy

Sustainable procurement policy (supplier selection)

Partner handbook (employee)

- 13.15 Environmental policy

Questions?

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