

# Empire Co. Ltd (Empire)

**TICKER**  
 EMP.CA

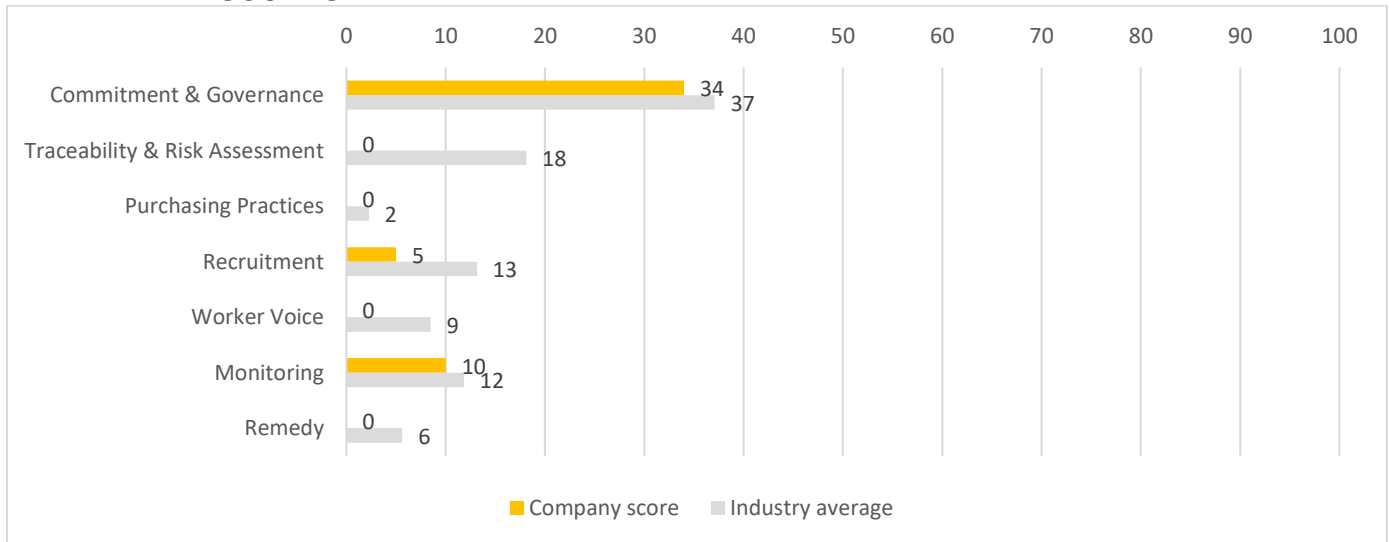
**MARKET CAPITALIZATION**  
 US\$8.2 billion

**HEADQUARTERS**  
 Canada

**DISCLOSURES**
UK Modern Slavery Act: Not applicable

Australia Modern Slavery Act:  
 Not applicable

California Transparency in Supply Chains Act: Not applicable

**OVERALL RANKING**
**35 out of 60**
**OVERALL SCORE**
**7 out of 100**
**THEME-LEVEL SCORES**

**KEY DATA POINTS**
**FIRST-TIER SUPPLIER LIST**
 No

**RISK ASSESSMENT**
 No

**ENGAGED WITH KNOWTHECHAIN<sup>1</sup>**
 No

**NO-FEE POLICY**

Yes /

**REMEDY FOR SUPPLY CHAIN WORKERS**
 No

**HIGH-RISK COMMODITIES<sup>2</sup>**
 Fish, palm oil, shrimp

---

## SUMMARY

Empire Co. Ltd (Empire), a Canadian conglomerate engaged predominantly in food retail, ranks 36 out of 60 companies. The company's score is based on its performance across the themes; Commitment & Governance, disclosing some detail on the management and implementation of its supply chain policies that address forced labour and Monitoring, by disclosing its audit methodology for identifying forced labour risks in its supply chains. It performs poorly on the themes of Traceability & Risk Assessment, where it neither discloses supplier lists or a human rights risks assessment process, Worker Voice, where it provides no detail on whether its grievance mechanism is available to supply chain workers or that it engages with unions to support freedom of association in its supply chains. It also performs poorly on Remedy, where it discloses no information on its processes for raising and resolving grievances or remedy outcomes for workers.

The company is encouraged to improve its performance and disclosure on the themes of Traceability & Risk Assessment and Worker Voice.

---

## LEADING PRACTICES

None

---

## OPPORTUNITIES FOR IMPROVEMENT

**Traceability & Risk Assessment:** To demonstrate a strong understanding of its supply chains, the company may consider disclosing the names and addresses of its first-tier suppliers, the countries in which its below-first-tier suppliers operate, the countries from which it sources raw materials at high risk of forced labour, and data on the demographics of the supply chain workforce (such as the percentage of women and migrant workers). The company is further encouraged to assess forced labour risks across its supply chains and disclose the risks identified.

**Grievance Mechanisms:** The company is encouraged to take steps to ensure that a formal mechanism to report grievances regarding labour conditions in the company's supply chains is available and communicated to its suppliers' workers and relevant stakeholders (e.g., worker organisations or labour NGOs). Further, the company may consider disclosing data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved.

**Freedom of Association:** To support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Further, the company is encouraged to disclose examples covering different supply chain contexts of how it improved freedom of association and/or collective bargaining for its suppliers' workers, such as migrant workers. The company is also encouraged to disclose the percentage of suppliers' workers covered by collective bargaining agreements. To guarantee protections for supply chain workers on freedom of association and collective bargaining, the company may consider entering into a global framework agreement or enforceable supply chain labour rights agreements with trade unions or worker organisations.

---

<sup>1</sup> Research conducted through January 2023 or through April 2023, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

<sup>2</sup> For further details on high-risk raw materials and sourcing countries, see KnowTheChain's 2023 [food & beverage benchmark findings report](#).