

Group Charitable Giving & Volunteering Policy

Scope Global

Owner of Document: Chief Governance and Compliance Officer

Date of creation: May 2023

Latest review date: May 2023

Next review date: May 2024

Classification External

Document code v1.0

About this policy

The purpose of this policy is to support YouGov's commitment to making a contribution to the communities in which the company operates; to outline YouGov's approach to charitable giving and employee volunteering; and to establish the principles that will guide YouGov's charitable activities. Charitable donations and volunteering form part of YouGov's social value contribution, in addition to our public data offering and our socially-oriented client work.

1. RESPONSIBLE PERSONS

- a. The Board of Directors of YouGov plc has overall responsibility for this policy.
- b. The Chief Governance & Compliance Officer is authorised with day-to-day oversight of the policy and will oversee a review of this policy at least once per calendar year.
- c. All staff are expected to comply with this policy, and any future iterations of the policy.

2. GIVING PRINCIPLES

- a. In line with our company purpose and values, and our <u>Global Code of Conduct & Ethics</u>, YouGov is committed to investing in social value and creating a positive impact in the communities in which we operate through provision of free public data, charitable donations, and volunteering.
- **b.** For the purpose of this policy, **Charitable Donations** are defined as a voluntary contribution of cash or an equivalent in-kind contribution (see Section 2.f.) made to a not-for-profit organisation or registered charity to help it accomplish its goals, for which the donor receives nothing in return. This does **not** include the following:
 - i. Sponsorship contributions, which are made to a commercial organisation with the intention of pursuing business interests and/or achieving business goals through supporting an event or organisation financially or through the provision of products or services.
 - **ii.** Partnership or membership fees that YouGov pays to an industry body for which the company receives benefits.
 - **iii.** The provision of free public data, which is published externally for the benefit of the general public.
 - **iv.** Research work commissioned by charitable organisations for which YouGov is paid.
- **c.** For the purposes of this policy, **Volunteering** is defined as freely offering time and labour for community service. This policy refers only to volunteering as conducted by employees on behalf of YouGov during business hours for an approved cause or organisation (see Section 4). This policy does not apply to personal volunteering outside of working hours and not on behalf of YouGov.
- d. YouGov focuses its charitable donations in the areas of science and technology, including the support of educational, career and research opportunities in the industry. In cases of emergency or humanitarian crisis, including natural disasters or health crises, YouGov will consider donations to charitable organisations that are responding to local needs.
- e. YouGov will only donate to or otherwise support organisations and/or causes that have been appropriately vetted. Vetting is conducted by the Governance department. YouGov uses the following criteria to determine whether a donation is appropriate. A list of pre-approved organisations is in Appendix I.

- i. The organisation has a reputation for ethical and responsible operations, generally an internationally regonised brand;
- **ii.** The organisation benefits local areas of operation by achieving social good and/or addressing a regional or national problem in of the area(s) of operation;
- **iii.** There is demonstrable evidence of tangible, positive impact from donations to the organisation; and
- **iv.** The contribution would be in compliance with all applicable laws and the Group Anti-Bribery Policy.
- **f.** In line with YouGov's values and neutrality principles, YouGov does not support the following with either charitable donations or volunteering:
 - i. Commercial organisations;
 - ii. Political organisations;
 - iii. Religious organisations;
 - iv. Military organisations and projects;
 - v. Organisations that discriminate on the basis of race, religion/belief, socioeconomic background, sex, sexual orientation, gender identity or expression, national origin, age, marital status, veteran status, disability status, HIV status, or any other identity characteristic;
 - vi. Organisations subject to UN, EU, UK or US Sanctions or that are involved in human rights abuses;
 - vii. Organisations that cause harm to the environment;
 - viii. Organisations that cause harm to animals;
 - ix. Individuals or private pursuits;
 - **x.** Activities that breach the <u>Group Anti-Bribery Policy</u>, the <u>Group Human Rights Policy</u>, or the <u>Global Code of Conduct & Ethics</u>;
 - xi. Activities prohibited by law or regulation; or
 - **xii.** Activities that encourage a relationship of dependence with the organisation.

g. In-kind donations:

- i. Where appropriate, YouGov or its employees may donate business time, skills, expertise, products and services, equipment, or the use of company facilities as an alternative to cash donations. This is classed as an in-kind donation, and may also be known as pro bono work. Any in-kind donation of products or services made by the company or an employee during business time must follow the approval process identified in Section 4 of this policy.
- ii. Where in-kind donations are proposed for an existing YouGov client, the YouGov Account Owner must provide their approval (see Section 4.a.i. of this policy).
- **iii.** In-kind donations are the provision of specific goods or services that would otherwise be provided by the business or individual for a fee and as such, are not considered volunteering.

h. Event donations:

i. Donations to support the delivering of events hosted by a charity are permitted with approval (see Section 4). For an event to be appropriate to support, it must be hosted by an approved charity, be

- providing a social good to a community, and/or be in line with the giving principles defined above in Section 2.
- ii. Fundraising events or donation drives (either virtual or in-person) may be hosted by individual staff members, subject to approval (see Section 4). Communication of staff-led fundraising events or donation drives must make clear that any contributions are made in an individual capacity and are not considered a corporate donation from YouGov.

i. Recurring donations:

- i. Any suggestions for recurring donations must go through the approval process (Section 4) for the initial donation and, if approved, will be subject to annual review. No automatic recurring donations will be approved.
- j. Cash donations to a charity must be made by YouGov. They may not be made by an individual on behalf of YouGov and reclaimed as personal expenses.
- **k.** Small donations to individual causes are not permitted.
- I. YouGov does not match individual donations made by employees.

3. BUDGET AND PAYMENT

- **a.** The budget for group-wide charitable donations sits within the Group Executive budget and is determined by the executive team at the start of each financial year. Any adjustments to the budget will only be made with the approval of the Executive team.
- **b.** Payment process:
 - i. If this is the first donation to the organisation or a NetSuite code does not exist, please use the one-time supplier code. You do not need to complete the Basic Supplier Approval Process in this case.
 - ii. If we have already donated to the approved charitable organisation, there may be an existing NetSuite code. If so, this code should be used for all future donations – please check NetSuite for an existing code before raising a new code.
- **c.** If a payment is being made directly using the organisation's bank details, the bank details must be provided on the organisation's letterhead.

4. GOVERNANCE AND APPROVAL PROCESS

Suggestions for donations and volunteering activities must be made through the <u>Charitable Donation and Volunteering Suggestion Form.</u> Suggestions will be reviewed by the Governance Department as they are received. Approvals will be determined by the Chief Governance and Compliance Officer.

a. A list of pre-approved charitable organisations is available in Appendix I. A donation to or volunteering activity for an organisation on this list <u>must still go</u> through the approval process to ensure the amount is appropriate.

i. Where the proposed activity is an in-kind donation for a charitable organisation that is an existing YouGov client, the Governance Department will seek the additional approval of the YouGov Account Owner.

b. Charitable donations:

- i. The Finance team will be responsible for ensuring a donation is made once it is approved.
- **ii.** Financial records will be maintained by the Finance team with supporting evidence maintained by the Governance team.
- **iii.** The donation amount and charity will be reported in the company's Annual Report & Accounts for the relevant financial year.

c. Volunteering:

i. For suggested activities within specific teams and/or offices, the Chief Governance and Compliance Officer will confirm approval with the relevant General or Regional Manager, as appropriate.

5. CONFLICTS OF INTEREST

Individuals proposing donations to a charitable organisation will be asked to declare any relationship with that organisation to identify any potential conflicts of interest. If a conflict of interest is identified, it will be managed according to the Group Conflict of Interest Policy.

6. SPEAKING UP

Any breach of this policy may result in disciplinary action being taken in accordance with the <u>Group Disciplinary Policy</u>. Concerns or complaints about possible breaches of this policy may be raised directly to the Compliance Team or following the procedures set out by the <u>Group Whistleblowing Policy</u> or the <u>Speaking up section on Youniverse</u>.

7. RELATED POLICIES

Group Anti-Bribery Policy	This policy defines our zero-tolerance approach to bribery and corruption.	
Group Conflict of Interest Policy	This policy defines our procedure for declaring	
	and monitoring conflicts of interest.	
Global Code of Conduct & Ethics	This code defines our behavioural	
	expectations for employees.	

Scope

This policy covers all global employees, officers, consultants, contractors, freelancers, interns, work experience students, casual workers and agency workers (collectively referred to in this policy as "staff") of YouGov plc and subsidiary companies.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Monitoring and Review

The Chief Governance and Compliance Officer will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

Version Control

Version	Name	Date	Changes
1.0	ESG Manager	May 2023	Policy Created

APPENDIX I: Pre-approved global charities

The following charities have been pre-approved by the Governance department for prospective donations.

As a listed company with strong ethical and neutrality principles, it is important that YouGov maintains its good reputation by engaging only with suitably vetted charities. These charities are globally recognised and considered to be reputable.

Note that any donations to these organisation are still subject to the approvals process outlined in Section 4.

- <u>Americares</u>: global not-for-profit focused on health and development in response to poverty, disaster, or crisis.
- <u>CARE International</u>: global NGO focused on emergency relief and long-term international development projects.
- <u>Direct Relief</u>: global not-for-profit focused on emergency medical assistance and disaster relief.
- <u>Médecins Sans Frontières (Doctor's Without Borders)</u>: global NGO providing humanitarian medical care primarily in conflict zones and in countries affected by endemic diseases.
- Oxfam International: confederation of independent charities focused on addressing global poverty.
- <u>The Red Cross</u>: global voluntary not-for-profit network providing humanitarian protection and assistance for victims of war and other situations of violence.
- <u>Unicef</u>: UN agency providing humanitarian and developmental aid to children worldwide.
- World Land Trust: global conservation charity focused on protecting habitats.