

Group Anti-Bribery Policy

YouGov plc and subsidiary companies (collectively “YouGov” or the “Company”) operate in countries that have laws that prohibit bribery and corruption. As YouGov is a UK headquartered company, the Bribery Act 2010 (the “UK Bribery Act”) applies to all staff and all global subsidiaries. Our full policy is available on request by email to compliance@yougov.com. This document is provided as an overview.

Scope

Our Group Anti-Bribery Policy (the “Policy”) covers all global staff, 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.

Purpose

The purpose of the Policy is to establish the procedures of YouGov in relation to the prevention of bribery and/or corrupt activities by any of its global businesses or staff. Further details (including definitions of bribery, corruption, facilitation payments, and conflicts of interest) are provided to staff in a complete internal Group Anti-Bribery Policy available on our global intranet site, Youuniverse.

Policy

The Board of Directors of YouGov plc have a zero-tolerance approach towards all corrupt practices including bribery. All staff are encouraged to report any suspicion of bribery and any instances of alleged bribery will be investigated.

The Policy adopts the categories of bribery as specified in the UK Bribery Act as criminal offences:

- a) **Bribing** (offering, promising or giving a financial or other advantage);
- b) **Being bribed** (requesting, agreeing to receive or accepting a financial or other advantage);
- c) **Bribery of foreign public officials**; and
- d) **Corporate Offence** (a corporate entity failing to prevent bribery by an associated person, including staff, customers, suppliers, agents and advisors).

Offences (a) to (c) apply to acts committed within the UK or outside the UK by a person with a close connection to the UK (including to a UK company and its subsidiaries such as YouGov plc). The Corporate Offence (d) applies to all companies that carry out all or part of their business in the UK, regardless of where the alleged bribery offence takes place.

Procedures in place within YouGov to support and implement the Policy include the following:

- a) Prohibition of payments such as facilitating or expediting payments to others to secure a prompt or proper performance of routine duties;
- b) Prohibition of Directors, staff or people or entities acting on behalf of YouGov or our group companies from receiving, offering, promising or influencing payments or contract awards, directly or indirectly, in return for anything of value by means of a bribe, kickback or similar payments;
- c) Prohibition of the use of sub-contracts or consulting agreements as a means of channelling payments or otherwise rewarding people or their families or business associates;
- d) Guidance on provision of hospitality, gifts, promotional expenditure or charitable and political donations;
- e) Risk assessment and due diligence processes;
- f) Disciplinary action under the Group Disciplinary Policy breaches of anti-bribery rules;
- g) Reporting mechanism, including confidential “whistleblowing” procedures (see Group Whistleblowing Policy for details of procedures);
- h) Communication of policies and procedures; and
- i) Training staff on compliance with YouGov policies and the UK Bribery Act.

Disclosure

If any member of staff or third parties has a genuine concern or wishes to provide information on a confidential basis they may contact the Whistleblowing Officer (Email: whistleblowing.officer@yougov.com).