Group Sanctions Policy

YouGov and subsidiary companies (together "YouGov " or the "Company") is committed to conducting our business in full compliance with all applicable international sanctions laws and regulations. We expect all staff to uphold the highest standards of legal and ethical conduct, including strict adherence to sanctions requirements. Our full policy is available on request by email to compliance@yougov.com. This document is provided as an overview.

Scope

The Group Sanctions Policy (the "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. This policy also applies to all suppliers, clients, contractors, subcontractors, and other third parties who provide services for or on behalf of YouGov.

Purpose

The purpose of the policy is to ensure that YouGov does not engage in any activity that would breach applicable sanctions laws, including those administered by the United Nations (UN), the United States (US/OFAC), the European Union (EU), and the United Kingdom (UK). The policy sets out the key obligations and restrictions that apply to YouGov's operations, business relationships, and third-party engagements to prevent sanctions violations and protect both the Company and its staff from legal, financial, and reputational risk.

Policy

Sanctions are restrictive measures imposed by governments and international bodies to fulfil a range of foreign policy, national security, and human rights objectives. For UK-headquartered companies such as YouGov, these measures include compliance with UN and other international obligations.

YouGov's sanctions compliance programme is built around the following key obligations:

a) **Prohibited operations:** YouGov shall not conduct operations, including market research, panel operations, data collection, or related activities, in any country or territory that is the subject of comprehensive territorial sanctions or where such activities are effectively prohibited under applicable sanctions regimes.

b) **Restricted business relationships:** YouGov shall not enter into, maintain, renew, or extend any business relationship with any supplier, client, contractor, subcontractor, consultant, agent, or employee who is located in, incorporated in, or ordinarily resident in any comprehensively sanctioned country or region, or who is otherwise a restricted party under applicable sanctions laws.

c) **Prohibition on subcontracting into sanctioned jurisdictions:** YouGov shall not, directly or indirectly, subcontract, outsource, or delegate any research panel operations to any third party located in, or with a nexus to, any sanctioned country or region, or any restricted party.

d) **Sanctions screening:** Based on its risk thresholds and prior to onboarding suppliers or clients, YouGov shall conduct appropriate sanctions screening against all applicable restricted party lists. Such screening shall be repeated at periodic intervals and upon any material change in the relationship or applicable sanctions designations.

e) **Country risk-based approach:** YouGov adopts a country risk-based approach to sanctions screening, meaning the Company bases its primary sanctions risk assessment on the geographic location and jurisdictional nexus of counterparties, rather than on the specific industry sector or subject matter of any research engagement.

f) **High-risk jurisdictions:** Operations in jurisdictions subject to targeted or partial sanctions require prior approval from the Compliance team and may be subject to enhanced due diligence, legal review, and ongoing monitoring.

Reporting and Escalation

All staff must immediately report any known or suspected sanctions violation, attempted violation, or activity that may give rise to a sanctions risk. Reports should be made to the Compliance Manager in the first instance, or to the Head of Compliance if the Compliance Manager is unavailable or conflicted.

Staff who report potential sanctions concerns in good faith shall not be subject to retaliation. YouGov's Whistleblowing Policy applies to all sanctions-related disclosures.

Staff, business partners and third parties may raise a sanctions-related concern by emailing the Compliance Manager at compliance@yougov.com.

Consequences of Non-Compliance

Sanctions violations can result in severe consequences for both YouGov and the individuals involved, including:

a) **Criminal liability:** Sanctions breaches constitute criminal offences in the UK, the US, and the EU, carrying significant penalties including imprisonment and substantial fines.

b) **Civil monetary penalties:** Regulatory authorities, including OFAC and OFSI, may impose significant civil monetary penalties for sanctions violations.

c) **Internal disciplinary action:** Any staff member who breaches this policy, whether intentionally or through negligence, will be subject to disciplinary action, which may include a written warning or dismissal.

d) **Reputational damage:** Sanctions violations may result in public enforcement actions, adverse media coverage, loss of partner relationships, and damage to client and investor confidence.

Monitoring and Review

The Compliance team will review the implementation of this policy on an ongoing basis to ensure its suitability, adequacy, and effectiveness. Reviews may be triggered by the imposition of new sanctions, the lifting or relaxation of existing sanctions programmes, relevant enforcement actions, or changes to YouGov's operational footprint.