September 2023

Global Code of Conduct & Ethics

YouGov®

Be fast | Be fearless | Get it right | Trust each other | Respect

business.yougov.com

Contents

1. Introduction to the Code	page 3
2. Our vision, purpose, mission, and values	page 4
3. Upholding the Code	page 5
4. Speaking up	page 6
5. Ethical business	page 8
6. Environmental, Social & Governance	page 10
7. Diversity & Inclusion	page 12
8. Key company policies	page 13
9. Statement from our COO	page 22

YouGov®

This code sets out the ethical basis on which we should conduct all aspects of our business.

YouGov has built a reputation for consistently delivering excellence in its business dealings throughout our history. Acting in an ethical and responsible manner will make our endeavours more successful as we continue to grow and develop our business in more markets.

This Global Code of Conduct & Ethics ("the Code") sets out the expectations that all of us will have to meet to ensure this reputation is carried forward into the future. The principles presented in this Code are instrumental to our success as a business and we trust you to apply them in your day-to-day activities.

This Code draws together our existing policies into one main reference guide. But no one document can set out what to do in every situation you will come across. We can give you guidance, but at the end of the day we must trust each of our colleagues to do the right thing.

If you think that something isn't legal or is inconsistent with our values of conducting our business honestly, ethically and with integrity, pause and seek advice as outlined in this Code.

No staff member will be penalised for seeking advice, speaking up, or applying this Code in good faith, even if at the cost of immediate business needs.

The Board of Directors and I thank you for safeguarding the reputation we have built through your efforts to make good decisions every day.

Steve Hatch,
Chief Executive Officer
September 2023

Introduction to the Code

At YouGov, we aim to always act responsibly and with integrity, respecting the laws and regulations of the countries within which we operate as well as internationally accepted standards of responsible business conduct.

YouGov plc and subsidiary companies (the "Group" or “YouGov”) requires the highest standards of professional and ethical conduct from all staff and directors. This code of business conduct (the "Code") sets out the standards that are required across the Group and links into Group policies and guidance documents that support the Code. This Code is mandatory across the whole Group wherever we do business.

This Code is underpinned by a suite of company policies. Our key policies are signposted in this Code and our full library of company policies is available on Youniverse.

Failure to comply with this Code is likely to result in disciplinary action, depending on the severity, up to and including dismissal. In serious cases, you may also be the subject of criminal sanctions.

When in doubt, always ask. If you have any questions or need advice in relation to compliance or ethical matters, contact the Compliance team. For legal matters, contact our Legal team.

All of us are expected to:

- Treat others with respect.
- Assume positive intent from others and communicate in a way that cultivates a supportive working environment.
- Respect YouGov’s environmental, social and governance (together “ESG”) commitments including those to diversity, health and safety, the environment and sustainability.
- Avoid any involvement in acts we know to be illegal, unethical, or otherwise improper.
- Have a practical working knowledge of YouGov’s policies and procedures affecting our responsibilities and to seek training where required.
- Read and understand this Code of Conduct & Ethics. Seek guidance when in doubt about our responsibilities or how to apply this Code in specific situations.
- Recognise that this Code cannot cater for every situation. It has been designed to help and promote the use of our judgment to do the right thing.

This Code will be regularly reviewed and revised in keeping with company policies and business changes. If you have any suggestions for improvements to the Code, contact the Compliance team.

Our vision, purpose, mission, and values

Our vision is for YouGov to be the world's leading provider of marketing and opinion data. We want YouGov data to be a valued public and client platform used by hundreds of millions of people on a daily basis, enabling intelligent decision-making and informed conversations.

Our purpose To give the world a voice through our global community by collecting, measuring and analysing their opinions and behaviours and reporting the findings accurately and free from bias.

Our mission is to supply a continuous stream of accurate data and insight into what the world thinks, so that companies, governments and institutions can make informed decisions.

Our values drive our business forward on a day-to-day basis and permeate through every aspect of our business, including the way we interact with our stakeholders. Our values reflect our pride in our entrepreneurial roots and environment where talented people collaborate to make big things happen.

Be fast. Things are ever changing and as a company we know we are in constant competition. We must always be fast to adapt, and fast to deliver.

Be fearless. Be brave and believe we can do anything. We've proven we can. So innovate, take savvy risks, don't follow the crowd.

Get it right. We are judged on our ethics, our methodology, and our accuracy – we will do the right thing as scientists, as technologists, and as citizens.

Trust each other. We have a mission, a strategy, and a plan for implementation. Let's all work together in trust – challenging, pushing, improving each other to fulfil our ambition.

Respect. We will respect everyone and be considerate of our differences, always supporting each other to succeed. Diversity helps us thrive.

Upholding the Code

Everyone who works for YouGov must act in a principled manner and in accordance with this Code. You are expected to demonstrate personal integrity, the company values, this Code and policies in our work. We consider ethical conduct to be at the heart of our business. By acting with integrity always, we sustain and build on our relationships with all our stakeholders (including our panel members, employees, clients, suppliers and investors).

Global application

YouGov operates in multiple countries, each with distinct laws, cultures, and political environments. We will comply with all applicable laws and regulations, wherever we operate. We will be culturally sensitive and not knowingly create work which contains statements, suggestions or images offensive to general public decency.

Should local law require a higher standard than our Code or any company policy, then we should adhere to the law.

If you identify any legal conflicts with our Code, you should seek advice from the Compliance team.

Line Managers

We rely on our Line Managers to reinforce the principles and policies of this Code and our company values. Line Managers are expected to lead by example and demonstrate good behaviours and work practices. The way you make decisions, handle concerns, and respond to different opinions, are all ways to demonstrate acting with integrity.

Behaviour expectations

We expect all staff to demonstrate YouGov's values and to be ambassadors of YouGov. In particular, we expect staff to always be respectful of others.

This Code provides guidance to staff on how to behave in certain situations. In addition to breaches of this Code, any of the following actions will result in disciplinary action:

- Unsafe, illegal or unethical working practices.
- Violence and aggression.
- Use or possession of illegal drugs.
- Discrimination, bullying or harassment, including sexual harassment.
- Bribery and corruption.
- Retaliation against anyone who speaks up in good faith.

Our Group Bullying and Harassment Policy includes examples of bullying and harassment situations that may occur in the workplace. These behaviour expectations apply to both work and work-related social events.

Your co-operation in making YouGov a safe, inclusive and professional workplace is expected.

Communication expectations

The company value of being respectful should be demonstrated in all our business communications, including face-to-face, video and the written word. Communications between colleagues should reflect and cultivate a respectful and supportive environment. Staff are expected to assume positive intent from others.

Speaking Up

There are different ways in which you can speak up if you have concerns about a colleague's behaviour or a compliance or legal issue, so that we can take appropriate action.

In all cases, your Line Manager is someone who you can share initial concerns with – they can help you think through possible resolutions and signpost the options available to you.

If your concern is about a colleague's behaviour:

If a matter can't be resolved through discussion with your Line Manager, then our Group Grievance Policy and Group Bullying and Harassment Policy outline the informal and formal routes available.

Your People Partner can help determine which route is appropriate for you. Find your People Partner on Youniverse.

In the case of harassment or bullying, even if an informal resolution is reached, HR will record details of the findings as it is important that we can identify any patterns of unacceptable behaviour.

Grievance policy

Our Group Grievance Policy enables staff to make a formal statement of complaint over something which is believed to be wrong or unfair. If you wish to make a formal complaint, follow the process set out in the policy.

If your concern is about a compliance or legal issue:

If you discuss the issue with your Line Manager and their response is insufficient, or it isn't appropriate to speak with them, then our Group Whistleblowing Policy is the answer.

You should speak to our Whistleblowing Officer, our CEO, or the Chair of the Board's Audit & Risk Committee (a Non-Executive Director) about your concerns. Contact details for each are contained in the policy.

You will never be penalised for reporting something which you genuinely believe to be wrong.

We expect you to speak up if you witness any of the following:

- Failure to comply with laws or legal obligations.
- Discrimination, bullying or harassment, including sexual harassment.
- Actions that put the health and safety of an individual in danger.
- Breaching rules or regulatory requirements.
- Failing to comply with this Code or company policies.
- Doing anything which has or is likely to have an adverse effect on our reputation or financial wellbeing.
- Deliberate concealment of any of the above.

You do not need to be certain about a situation to speak up; a reasonable belief that a relevant matter has taken place, is taking place or is about to take place is sufficient. However, if you are found to have reported a matter maliciously then you may be subject to a disciplinary or legal process.

Ethical business

We operate our business ethically and empower staff to make ethical business decisions. This section highlights key ethical areas for YouGov.

Data and research ethics

Our approach to data and research ethics can be summarised by the following attributes which we must apply to all our work:

- **Fair:** We pursue no hidden agenda. Survey questions are framed to be as clear and neutral as possible and use non-inflammatory language.
- **Thorough:** We aim to represent opinion as completely as practical, not leaving anything out that contributes to a rounded picture.
- **Respectful:** We aim to represent the full range of opinion, without judgement. However, we will not knowingly create work which contains content that is, or is likely to be, offensive or objectionable.
- **Transparent:** In publishing public opinion data, we disclose how that data was created and what it represents.
- **Accurate:** We work to ensure that our methodologies, tools, research and data are of the highest quality and accuracy.
- **Representative:** We aim to represent the full range of demographics and we do not knowingly discriminate.

All at YouGov are guardians of these attributes and of the public trust that flows from them.

Compliance with partner Codes of Conduct

All staff in research and data handling roles are expected to comply with the relevant Codes of Conduct of the industry associations of which YouGov is a member; you can find details of these on Youniverse.

Neutrality

An important way that YouGov demonstrates these attributes to the world is through maintaining our reputation for neutrality.

YouGov gives a voice to what the world thinks. We help people to express their views and experiences and make them count. To express our own opinions would be to platform ourselves over the views of others and to go against our corporate purpose.

We have a strong culture of respect, fairness and diversity within the company, and these are fundamental aspects of our work. We serve that culture best by delivering our work diligently and maintaining a neutral, non-partisan stance as a commercial organisation.

While we may serve political organisation clients, we are not affiliated with any political party and we do not make political donations. Similarly, while we may provide our data and research to cause-based organisations - both commercially and philanthropically – YouGov is not affiliated with any particular causes.

All staff must complete mandatory neutrality e-learning in YouGov Academy.

Ethical business

Contentious research topics and clients

While it is YouGov's ambition to provide its products and services to clients from all industries and regions, and to undertake research on the full range of public opinion, in limited circumstances we will decline to work with a particular client or to run a specific project. Our Contentious Clients & Topics Guidance on Youniverse explains how to approach potentially contentious research topics or clients.

Research topics

For legal, ethical and cultural reasons, certain topics either cannot be covered in our research or require specific handling in certain markets. Typically, these are topics relating to social issues. The Contentious Clients & Topics Guidance on Youniverse explains how to assess if a research topic is contentious and, if it is, how to approach handling the project. If you need further assistance on this, speak to the Panel team.

Clients

There are certain organisations and industries whose activities YouGov would not want to provide products and/or services to because doing so could damage our existing relationships, harm our corporate reputation as an ethical business, and/or undermine our company values. The Contentious Clients & Topics Guidance on Youniverse explains how to assess if a client is contentious and, if it is, how to approach handling the project. If you need further assistance on this, speak to the Compliance team.

Ethical decision making

When faced with an ethical decision to make, we ask that staff give consideration to these questions:

- *Is the proposed decision or action in line with YouGov's company values, this Code, and our professional standards?*
- *What is the potential impact on our stakeholders, society, or the environment?*
- *Have I considered any impact on YouGov's reputation?*
- *Is it in YouGov's long-term interest?*
- *Have I understood the risks and possible implications?*
- *Have I sought advice to help me make an informed decision?*
- *Am I authorised to make the decision?*
- *Am I leading by example?*
- *How would I feel if the action I take is featured in a newspaper tomorrow?*

Contact the Compliance team should you need support or advice in relation to business ethics.

YouGov

Environmental, Social & Governance (“ESG”)

When we refer to ESG at YouGov, we are using it as an umbrella term for business practices that are ethical, socially responsible, and environmentally conscious. Responsible business is core to what we do, from how we collect data from members, to how we service our clients and how we handle our employee relations.

It is YouGov’s policy to focus our attention on those ESG areas where we can be the most impactful. For example, our core mission is to give people a voice; consequently, we invest in Public Data initiatives, making a large amount of data available for free to ensure everyone’s voice is available to be heard. We can also have a positive impact by supporting our clients with their own ESG ambitions through the provision of unbiased and reliable insights.

We strive to be proactive in addressing our environmental impact and creating a culture where all employees are welcomed and celebrated as their authentic selves.

Good ESG practice at YouGov

Environmental

Protecting the environments in which we operate

Examples

- Transparent reporting of our environmental impact
- Using renewable resources to power our offices where possible
- Reducing our carbon emissions and encouraging the same within our supply chain

Social

Having a positive impact on the people and communities with whom we interact

Examples

- Provision of free public data for social value
- Addressing areas of under-representation within our business
- Supporting the mental health and wellbeing of our employees

Governance

A corporate governance framework for ensuring responsible business practices

Examples

- A strong framework of company policies and procedures
- High quality corporate reporting
- Oversight by a majority independent Board of Directors

Key ESG Policies

ESG Roadmap

Our first ESG Roadmap was published in June 2021 to identify YouGov's strategic approach to ESG. The Roadmap is now updated on an annual basis with objectives and actions to invest in long-term continuous progress, and updates are communicated through the corporate website, Annual Report, Youniverse, and internal communications. The latest version of the Roadmap and further details of key initiatives are available on Youniverse.

Protecting our environment

As an online business we have a low environmental impact, but we are not without impact and we take our responsibility to protect the environment seriously. As of 2023, we calculate and report our global carbon footprint in the Annual Report.

To understand our approach to the environment, you should refer to our Group Environmental Policy and the ESG section of Youniverse.

Giving a Voice: Investing in our community

We have defined our social mission as "Giving a Voice," which includes our investment in Public Data initiatives, where we can make the biggest impact in the communities in which we operate. We also partner with select organisations that specialise in areas aligned with our business model and provide a benefit to the wider community.

While we focus our community investments on these targeted partnerships and Public Data initiatives, our Group Charitable Giving & Volunteering Policy outlines our approach to charitable donations and employee volunteering activities on behalf of YouGov.

Human Rights

While we have always maintained fair labour practices and safeguarded against human rights abuses, FY23 we published our Group Human Rights Policy to formalise this commitment.

Diversity & Inclusion (D&I)

Diversity and Inclusion ("D&I") are fundamental to YouGov. We are committed to giving the world a voice by capturing the opinions of all groups, including the ones that are often under-represented in research. We are also committed to making sure that our products, research, and tools are free from any bias, as accuracy is key to what we do. None of the above can be done without having a truly diverse workforce, in an inclusive workplace.

YouGov is committed to providing equal opportunities and a workplace that is representative of the global society in which we operate. We aim to cultivate a culture and environment where our people can be their whole selves and feel empowered to achieve their career ambitions. Our robust diversity and inclusion strategy and action plans are one way we ensure we meet these aims and hold ourselves to account for doing so.

Our D&I Council acts as a guarantor of diversity and inclusion at YouGov. It has the authority to make decisions related to D&I and implement initiatives. The Council sets objectives for YouGov to work towards in terms of D&I and measures progress against those goals. It ensures that YouGov's D&I initiatives and objectives are fully aligned with the company's wider strategy and business plans.

Equal opportunity employer

YouGov is an Equal Opportunity Employer. Employment decisions are made by YouGov without regard to race, religion, socioeconomic background, sex, sexual orientation, gender identity or expression, national origin, age, marital status, veteran status, disability status, HIV status, or any other characteristic protected by law or in line with our responsibilities as a fair and ethical employer. All employment decisions are made on the basis of occupational qualifications, merit, and business need.

Getting involved

Staff are encouraged to join D&I Network Groups (Employee Resource Groups) or volunteer as a D&I Champion to participate in the D&I conversation at YouGov. Information on our current Network Groups and how to join are on Youniverse.

D&I Roadmap

In April 2022, we introduced the D&I Roadmap which defines our vision for D&I at YouGov and identifies actions for progress towards that goal. Updates on the D&I Roadmap are overseen by the D&I Council and shared periodically on Youniverse.

Key company policies

YouGov®

Key company policies

a Data privacy

We are committed to collecting and using data in a lawful, fair, and ethical way, and will always respect the privacy of individuals.

Any information related to an identified or identifiable person must be collected and processed in compliance with applicable data privacy laws, such as the EU General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA).

Staff with access to personal data are expected to follow internal guidelines, policies and processes to apply the key principles of processing personal data: lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality and accountability. More information about these principles are available in our Group Data Protection Policy.

Anonymisation and pseudonymisation techniques are used to protect individuals' privacy rights. Staff who have access to such data must not try to identify of any individual from which data was derived from. We expect the same of our service providers, collaboration partners and clients.

We are all expected to:

- Collect, use and store data in compliance with applicable laws, privacy principles and commitments we have made to our staff, members, clients and other businesses we work with.
- Respect individuals' privacy always.
- Never re-identify or attempt to re-identify anonymised data.
- Carefully select third parties we trust to process personal data which we are responsible for, and ensure an appropriate contract is in place.
- Consider every data use as an opportunity to create and reinforce trusted relationships with those who provide us with their personal data.

b Information security

Information generated by our members is our key asset. We protect and safeguard our information as it is vital that what we provide our clients is not compromised in any way.

We achieve this through a combination of appropriate strategies and approaches:

- Identifying, assessing and treating our risks (proactive risk management).
- Protecting CIA (Confidentiality, Integrity and Availability).
- Avoiding, preventing, detecting, responding to and recovering from incidents.
- Securing people, processes and technology.

Our policies and controls are designed to protect our information assets against theft, unauthorised disclosure, trespassing, misuse and careless handling.

All staff must be cautious when accessing sensitive data and must only share it with other staff who have a legitimate need to know.

We are all responsible for making sure that our IT systems are used appropriately. Each individual is responsible for all activities that are performed under their system identity. Staff should not share their YouGov credentials with anyone.

Our Data Privacy and Information Security Policies

It is your responsibility to abide by our policies and guidance in your everyday work – You can access Data Privacy and Information Security policies on Youniverse.

If you are unsure whether you handle YouGov data, discuss it with your Line Manager. Any questions about this section or our policies, speak to the Group Data Protection Officer or Head of Information Security.

Key company policies

c External communication

All staff are expected to familiarize themselves with the Group PR Policy which sets out the rules for YouGov's interaction with the media.

Press releases

YouGov regularly has corporate news - e.g. new products, management hires, partnerships and acquisitions - that we would like to share with external stakeholders, such as trade media, clients and suppliers. It is important that corporate news is not published without the appropriate prior approval as per the Press Release Approval Process.

Editorial content

For rules and guiding principles of YouGov's editorial content, please refer to the Group Editorial Policy. Editorial content on our external facing websites must only be posted by those with approval to do so. If you wish to seek approval, speak to the Editorial team.

Media statements and interviews

If you are invited to comment on YouGov activities or operations by any member of the media, you should not make any comment unless you are authorised to do so. Instead, you should refer them to our Press Office team.

Social media

Social media can bring significant benefits, particularly building relationships with current and potential clients and other stakeholders, but it must be used in a responsible way. A misjudged statement can generate complaints and possibly damage YouGov's reputation. Always carefully consider any remarks you make about YouGov on social. For advice, refer to the Global Social Media Policy and/or speak to our Social Media team.

Business communication

Our business communications, both internal and external, should be honest, accurate and well intentioned. We expect staff to be respectful of others in all communications, no matter what format. Staff should be mindful that all business communication may be shared and become public through litigation, data subject access request, regulatory investigation, or publication by the media.

Key company policies

d Listed company obligations

YouGov's parent company, YouGov plc, is listed on the AIM sub-market of the London Stock Exchange. Accordingly, YouGov plc is a public company and its shares are publicly traded. For any questions in relation to this, speak to our Investor Relations team.

Corporate reporting

The laws that apply to us as a public company require full, fair, accurate, timely, balanced and understandable disclosure in the financial reports and documents that YouGov publishes for the benefit of investors and regulators. Inaccurate or incomplete reporting or public statements can severely harm YouGov's reputation. Staff are expected to uphold high quality standards in corporate reporting and to comply with requests from our auditors.

Record-keeping

Robust record-keeping is critical to maintaining business integrity, making good business decisions, and meeting our corporate reporting obligations. Our records should be clear, accurate and complete. Financial and sales-related accounting records should be maintained in accordance with local law and international financial reporting standards; if you have any questions on this, speak to your Regional Finance team.

e Share dealing

We must not engage in insider trading.

"Insider trading" or "insider dealing" is the sale, purchase, exchange or other trading of shares (including the exercise of options) based on material information not readily available to the public (i.e. information an investor would consider important in deciding to trade). Such "inside information" may be that affecting YouGov itself (including unpublished YouGov data), or other companies with which we are dealing such as current or prospective customers and other business partners.

Criminal and civil liability for insider trading may attach both to employees and their friends and family. For further guidance, see the Group Securities Dealing Policy which provides guidance as to when dealings by you in YouGov shares may require approval.

If you are in any doubt about the implications of a proposed transaction in YouGov shares, you should contact the Company Secretary prior to undertaking any such transaction.

Q: I saw a document on a photocopier outlining an upcoming acquisition by YouGov. I only glanced at it and I am not an accountant. Am I in possession of inside information?

A: In all likelihood, yes, you are. You must not disclose the information to anyone else. Also, you must not buy or sell any shares in YouGov plc without permission. You should contact the Company Secretary to inform them of your having seen the document.

Key company policies

f Working with third parties

It is important that we work with clients and suppliers who are aligned with our ethics and values. We have processes to follow when engaging with third parties to ensure that we are doing so safely and in accordance with this Code. In this section we'll outline the key points to remember. You can find more detailed guidance in the Working with Third Parties section of Youniverse.

Contracting with clients

Contracts define our rights with, and obligations to, our clients. You must follow YouGov's process for contracting with clients, which is how we manage the negotiation, execution, modification and, if necessary, termination of client contracts. This ensures that we have clear legal agreements setting out our working relationships with our clients. All client-facing staff are required to familiarise themselves with this process. We have resources on Youniverse to guide you through Contracting with clients. For support on contracting with clients contact the Legal team.

Engaging Suppliers

The Business Partner Code of Conduct outlines compliance expectations for suppliers and ensures that our suppliers operate with integrity and are aligned with our values. As a minimum we expect our suppliers and business partners to:

- Comply with all relevant and applicable laws and standards.
- Conduct their business ethically.
- Protect their workforces and value diversity.
- Have zero-tolerance of bribery, corruption, fraud and tax evasion.

The Supplier Approval Process includes an assessment of their approach to compliance issues as well as a legal review of their terms. All staff who engage suppliers are required to follow this process.

Ensuring fair competition

YouGov conducts its business within the principles and regulations in place to protect free competition. Fair competition is a key element for the development of both YouGov and the market.

- We define and conduct our commercial activity autonomously with respect for our competitors;
- We do not misrepresent YouGov or our competitors, including in our marketing campaigns;
- We conduct our business based on our own strategic and commercial decisions; and
- We comply with antitrust and competition regulations.

For support on competition and anti-trust matters, contact the Legal team.

Key company policies

g Professional standards

We take our professional responsibilities seriously. We voluntarily comply with the codes of practice and standards of several market research industry bodies, including ESOMAR (Global), Insights Association (USA), the Market Research Society (UK), and the British Polling Council (UK). All research staff should familiarise themselves with the ESOMAR Code and any regional codes we follow. For more information, see the Partnerships, Memberships & Affiliations page on Youniverse.

h Partnerships, Memberships & Affiliations (PMAs)

YouGov is keen to partner with organisations that are relevant to our core areas of expertise and meet the following criteria:

- Align with YouGov's company values
- Align with YouGov's business and corporate strategy
- Allow YouGov to maintain a neutral stance as a company (i.e. not be politically affiliated)
- Meet a business need

If you would like to engage or recommend a new corporate partnership for YouGov, speak to the Chief Governance and Compliance Officer.

A full list of current PMAs, as well as guidelines for agreeing to corporate PMAs, is available on Youniverse.

Individual employees may hold personal memberships both in relation to their work at YouGov and in a personal capacity. These memberships do not have to be disclosed to YouGov unless the employee wishes to act as a representative of YouGov.

i Conflicts of interest

Conflicts of interest can arise if you have competing personal, family or other interests which influence the fair and impartial exercise of your duties. The mere appearance of a conflict of interest can undermine trust, even if mitigating factors are present.

Conflicts of interest should be avoided where possible - but we recognise that staff may carry out activities outside their role with YouGov. The Group Conflict of Interest (COI) Policy sets out YouGov's approach to recognize, report, mitigate, and prevent potential conflicts of interest. You must discuss any potential or actual conflicts of interest with your Line Manager, who may in turn discuss the issue with the Chief Governance and Compliance Officer.

Examples of conflicts:

- Employment with a current or prospective business partner or competitor.
- Employment outside the company that may otherwise interfere or conflict with your YouGov duties.
- Acting as a consultant to, or director of, any organisation involved in the same business as YouGov or a current or prospective business partner or competitor.
- Involvement in any organisation (including any voluntary activities) that has the potential to create business.
- A personal relationship with a prospective supplier.

Key company policies

Compliance Policies

YouGov has a zero-tolerance approach to corruption including bribery and breach of sanctions. You should be mindful of these risk areas when dealing with third parties.

Activities that may cause concern include:

- A client is reluctant to offer information or clear answers on routine commercial issues (e.g. intended geography of sales, beneficial ownership, or locations of operation).
- A client making payment to YouGov has a different company name or location than the original client or ultimate end-user.
- Suppliers with unusually favourable payment terms or requesting cash payments.

j Money laundering

We have a zero-tolerance approach to money laundering activities both within our business and by our suppliers or clients. You are expected to follow all relevant anti-money laundering procedures in place.

k Sanctions

Sanctions are regulatory restrictions applicable to dealings with certain countries or territories, governments, groups, entities, individuals, or controlled goods or services. The nature and extent of these restrictions may vary (i.e. limitations on import/export, controls on specific goods and services, restrictions on financial operations, etc.), and it is important that all staff understand the business implications.

Countries and individuals subject to sanctions can change frequently and you should consult with the Compliance team if you are in any doubt.

l Bribery and corruption

We have a zero-tolerance policy towards bribery and corruption in our operations, as set out in our Group Anti-Bribery Policy.

This extends to all business transactions in all countries in which we operate.

You will not suffer adverse consequences for refusing to give or receive a bribe, even if it means that YouGov loses business as a result. If you are offered a bribe, report it immediately.

At YouGov, we:

- Do not offer or give bribes.
- Do not accept bribes.
- Do not use third parties to offer or give bribes on our behalf.
- Do not facilitate or engage in tax evasion.
- Comply with applicable laws and give regular training to employees on what can and can't be done, to ensure compliance with the law.
- Select companies that we work with very carefully to ensure that they share in our commitment to do business legally and ethically.
- Are always open and transparent.

Always seek advice from your Line Manager and/or the Compliance team if you are faced with a scenario that you are unsure of or feel uncomfortable about.

Key company policies

m Gifts and hospitality

Meals, hospitality, and small gifts can be legitimate business activities when conducted in the right way. However, they could be a form of bribery if they are excessive in value, inappropriate in nature, too frequent or intended to have an improper influence on a decision. It is important that you exercise your reasonable judgement as to whether a gift or hospitality could be construed as a bribe.

- Only offer or accept gifts and hospitality if they:
- Impose no sense of obligation on the recipient.
- Will in no way affect commercial decision-making.
- Would cause no embarrassment if it became public.
- Have been approved and recorded under the Group Anti-Bribery Policy and procedures where required.

n Timesheet compliance

Should you be required to complete a timesheet by your Line Manager, you are expected to do so accurately and on a weekly basis, so as to provide an accurate record of time spent on tasks and activities.

o Delegation of authority

Execution of documents such as contracts, leases and MSAs can result in liability for YouGov and it is important that these documents are signed in a compliant manner. Staff are required to comply with any delegation of authority guidelines in place at any point in time. If you have any questions about signing authority, contact the Compliance team.

High Risk	Low Risk	What's the difference?
You are given tickets to an event paid for by the client where the host is not present	You are invited by the client to an event where they will be in attendance.	Accepting hospitality at an event with a client is a normal business activity, whereas using tickets for your personal use is potentially bribery.
A prospective supplier sends you the latest model of iPhone to thank you for invitation to tender.	An existing supplier sends you a box of chocolates at Thanksgiving to thank you for your business during the year.	Sending a bespoke or specific gift is an attempt by the supplier to gain favour from you and is not appropriate. Sending a generic gift once per year to thank you for your business is appropriate.
You send a hamper to a prospective new client.	You send an existing client a small gift at Christmas.	Sending any gift to a prospective new client is high risk. Sending generic gifts once a year to existing clients is low risk.

p Policy approval process

All significant company policies must be approved by the Global Coordinating Committee (Glocom). Glocom is the forum for group management to approve new policy decisions, chaired by the Chief of Staff.

To discuss approval of a policy by Glocom, speak to the Chief of Staff.

Key company policies

q Health and safety

We have a duty of care towards protecting the health and safety of all staff and others who may be affected by our activities, as set out in our Group Health & Safety Policy.

YouGov takes its responsibility for health and safety very seriously and is committed to a progressive improvement in line with the company's growth, that requires input from all staff.

YouGov will do all that is reasonably practicable to provide and maintain:

- Safe places of work, with safe methods and systems of work;
- Safe plant and equipment;
- Personal protective equipment relevant to working tasks; and
- A safe and healthy working environment.
- Staff have a duty to:
- Comply with health and safety policies;
- Promptly report any issue which could cause injury or illness;
- Report any injury or illness which occurs during work or at a YouGov location; and
- Co-operate with any health and safety investigation.

If you see anything during your work that gives rise to a concern or you have any questions, you are positively encouraged to report it to Global Facilities.

r Wellbeing

We have a responsibility to ensure that staff wellbeing is maintained, including a good work / life balance. Our Group Working Arrangements Policy enables staff to request flexible working arrangements which suit their commitments outside of work. Wellbeing resources on Youniverse are available for all staff globally.

s Freedom of association

In accordance with the International Labour Organization expectations, YouGov supports the human right of all staff to associate freely, join or form a trade union, and bargain collectively. This commitment is outlined in the Group Freedom of Association Policy.

t Gambling, betting or trading on YouGov data

YouGov has a zero-tolerance policy on trading, gambling, betting or other form of personal gain (financial or otherwise) by staff and/or their friends and family based on unpublished YouGov data, including research and polling data. This trading prohibition includes shares, options, gilts, bonds, spot foreign exchange and/or political futures. Failure to comply with this instruction may result in disciplinary action and may constitute insider trading for the purposes of market abuse regulations which has personal liability implications. For more information on "Insider Trading" see "e" above. This policy does not prevent staff from trading, gambling or betting based on publicly available data, subject to adherence with our Share Dealing policies (see "e" above").

YouGov Global Code of Conduct & Ethics

Document information

Scope	Global
Owner of document	Chief Governance and Compliance Officer
Date of creation	June 2021
Latest review date	September 2023
Next review date	June 2024
Classification	Internal & External
Version	v1.2

Scope

This Code 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 Code 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	Author	Date	Changes
1.0	Governance Team	June 2021	Policy Created
1.1	Governance Team	June 2022	Policy Updated
1.2	Governance Department	September 2023	Policy Updated

YouGov®