

March 2024

# **Business Partner Code of Conduct**

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**Working with our business partners, suppliers,  
affiliates, and contractors compliantly and ethically**

**YouGov<sup>®</sup>**

# Introduction

YouGov plc and subsidiary companies (together “we”, the “Group” or “YouGov”), is an international online research data and analytics technology group.

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 employees adhere to a Global Code of Conduct & Ethics, which requires the highest standards of professional and ethical conduct from all staff and directors. The same principles inform this Business Partner Code of Conduct & Ethics (the “Code”), which sets out the compliance expectations for our business partner relationships.

We are driven by a set of shared values. We are **fast, fearless and innovative**. We work diligently to **get it right**. We are guided **by accuracy, ethics and proven methodologies**. We **trust each other, treat each other with respect** and bring these values into everything that we do. We seek to work with business partners who align with these values and share our commitment to ethical, sustainable, and responsible practices.

# Business partner responsibility

This Code applies to any individual or business that provides YouGov with products or services – including all suppliers, affiliates, sub-contractors and their officers, subsidiaries, affiliates, employees, sub-contractors, agents, representatives, and consultants (together “You” or the “business partners”). **By entering into a contractual agreement with YouGov, a business partner must also accept and agree to comply with the obligations set forth in this Code.**

Business partners will cooperate with any information requests or audits we may initiate to confirm their compliance with this Code. Any failure by the business partner to adhere to this Code may be considered a material breach of contract by the business partner and YouGov reserves the right to terminate any underlying agreement and the business relationship with a business partner in the event of such breach.

**We are proud to work with business partners who are continuously working to improve their operations.**

**If you have questions or concerns about your compliance with this Code, please contact [governance@yougov.com](mailto:governance@yougov.com).**

## Fair competition

YouGov complies with all applicable fair competition laws and ensures open, free and fair competition between its Business partners.

## Speaking Up / Whistleblowing

If you have any questions about this policy or concerns about its application, please contact us.

A summary of our whistleblowing policy is available in many languages, contact us if you'd like to receive a copy.

See the last page of this Code for contact details.

# Operate ethically and with integrity

## *Be legally compliant*

You must comply with all applicable laws relating to your business and applicable in the countries in which you operate. You must seek similar commitments from your business partners across your own supply chains. This includes compliance with [US](#), [EU](#) and [UK sanctions](#) and any other regulatory restrictions applicable to dealings with certain countries or territories, governments, groups, entities, individuals, or controlled goods or services.

## *Social media*

You are not permitted to speak on behalf of YouGov on social media, to represent yourselves as our business, or to represent any views or communications developed by YouGov as your own (unless with express written permission).

## *Be aware of conflict*

Conflicts of interest may arise where the interests of a company or individual within a company conflict with those of a client, customer, or the company itself (in the case of an individual employee). A conflict of interest does not necessarily preclude your supplying services to YouGov, but it must be disclosed. As such, you are expected to proactively identify and disclose any potential or actual conflicts of interest with YouGov or our clients and consumers.

## *Ensure free competition*

You are expected to operate in a manner that promotes free competition and to avoid practices that may be viewed as anti-competitive. If you are collecting information about third parties, either that is publicly available or that may be considered competitively sensitive, confidential, or proprietary, You are expected to do so carefully and pursuant to the law, as well as to use such information only as permitted.

## *Insider trading*

You must avoid insider trading in relation to YouGov or any other company and must prohibit employees and board members from trading based on information that has not been made public. This may include information which you obtain whilst providing services to YouGov.

## *Ensure the safety and security of data and information*

If you are handling personal data on behalf of YouGov, you will be a “data processor”, “service provider” or equivalent under any applicable privacy laws. This means we will require a data processing agreement in place between You and YouGov that sets out the obligations you have with regards to the YouGov personal data you have access to, such as only using the data in line with YouGov’s documented instructions, taking appropriate technical and operational measures and promptly informing YouGov of any potential or actual security incidents. You will also follow all data protection laws which apply to your activities with us.

# Bribery and corruption

## *Bribery and corruption*

You should not make or accept bribes of any kind and should use all reasonable practices to prevent bribery in all forms. You shall abide by all applicable anti-corruption laws, regulations, and industry standards in your country of operation, including, but not limited to the US Foreign Corrupt Practices Act and the UK Bribery Act 2010.

## *Facilitation of tax evasion*

You must take a zero-tolerance approach to tax evasion and, at minimum, you must comply with the UK Criminal Finances Act 2017, and all applicable laws, regulations, and industry standards in your countries of operation.

## *Money laundering*

You must take a zero-tolerance approach to money laundering activities within both business operations and supply chains.

## *Hospitality and gifts*

You must not provide any gifts, trips, meals, or entertainment to a YouGov employee, or any third party in relation to any business conducted with YouGov, as a bribe or in a way that appears to be a bribe (i.e., excessive in value, inappropriate in nature, too frequent, or intended to have an improper influence).

If you receive an inappropriate gift from a YouGov employee, you must report it to [YouGov's Compliance team](#).

*Do not be offended if we return a gift or do not accept an offer of hospitality, YouGov staff may only offer or accept gifts of modest value and we exercise care when offering or accepting gifts from business partners.*

# Human rights and labour practices

## ***Modern slavery***

You must prohibit the use of forced or bonded labour, both in your own operations, and in your supply chains. Business partner employees, including migrant workers, must be given the right and the ability to leave employment when they choose. You must not hold workers' identity, immigration, or work permit documents longer than reasonably necessary; you must not restrict the movement of workers; and you must not ask workers to pay any recruitment or employment fees.

## ***Minimum wage***

You must pay the minimum legal wage to all employees and ensure a regular wage that meets the basic needs of employees. YouGov is an accredited [Living Wage Employer](#) and we encourage our business partners to seek relevant local accreditation or implement an equivalent scheme.

## ***Child labour***

You must follow local minimum age requirements for employment. Employees under the age of 18 must not be asked to perform work that may threaten their health or safety, including working overtime or night shifts.

## ***Freedom of association***

You are expected to support the freedom of association of your workers by protecting the right to participate or not participate in unions (or participate in another form of collective bargaining) without fear of retribution.

## ***Working hours and conditions***

You must follow all applicable regulations and standards for working conditions relating to your business. This includes guaranteeing legally mandated break/rest periods, limiting working hours and overtime according to regulations, and providing a contract in the worker's language that provides written details about working conditions and reflects accurate hours worked. You must allow workers at least one day off every seven days.

## ***Safe working environment***

You are responsible for protecting the health and safety of all staff and others who may be affected by your business operations, including in residential facilities provided by your business (where relevant). You must comply with all applicable health and safety laws and regulations and must take necessary precautions to prevent accidents and injury during all business operations. You must provide and maintain safe places of work with clean, well-lit, and properly ventilated facilities, properly maintained equipment, and PPE relevant to working tasks.

## ***Non-discrimination***

You must prohibit harassment, abuse (verbal, physical, or visual), corporal punishment, inhumane treatment, or behaviour that creates an intimidating, offensive, or hostile workplace.

# Equity, Diversity & Inclusion

## *Equal Opportunity*

YouGov is an equal opportunity employer. We invite and encourage all staff to be themselves at work, regardless of 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.

We expect you to share this commitment and ensure that all employment decisions are made based on occupational qualifications, merit, and business need, rather than personal characteristics. You must abide by all relevant equality and anti-discrimination legislation in your countries of operation.

YouGov will not tolerate discriminatory behaviour by employees or its business partners.

## *Inclusive work environment*

You are expected to cultivate a working environment where employees feel free, comfortable, and encouraged to be themselves and where candidates and employees are evaluated solely on their ability to perform the job. This includes putting measures in place to protect the mental health and wellbeing of your workers. Where appropriate, you may be asked to provide evidence of a commitment to embedding Equity, Diversity & Inclusion within your operations with tangible plans for action.

# Further commitments

Business partners are expected to make the following commitments:

## *Protecting the environment*

YouGov is committed to proactively reducing its impact on the environment. You must comply with all applicable environmental legislation and regulations. We encourage business partners to have a written environmental policy or statement which addresses greenhouse gas emissions, waste management, biodiversity management, sustainable land management, and resource use (as appropriate to the size and nature of your operations). We ask that you proactively seek to use resources efficiently, calculate your carbon footprint, and take reasonable steps to minimise emission of greenhouse gases and of toxic and/or hazardous pollutants.

Preference will be given to business partners who proactively align with YouGov's environmental commitments, particularly in the reduction of e-waste and plastic waste.

## *Quality management and control*

You are expected to have implemented appropriate quality management and controls and to act in accordance with the latest guidelines for your industry, as appropriate for the services or products you provide to YouGov. Business partners that provide market research services to YouGov are expected to commit to and uphold market research quality standards in line with ISO 20252. Should you have any queries what this means for you, you can contact YouGov [Compliance](#).

## *Emergency preparedness*

You are expected to identify and assess potential emergency situations in the workplace and develop response procedures to minimise damage and harm (e.g., accessible first-aid supplies, evacuation procedures and routes, staff training and drills, etc.).

## Compliance with the Business partner Code of Conduct & Ethics (the “Code”)

All business partners must comply with the Code. However, we recognise that our business partners operate in different legal and cultural environments, and we are open to discussions with businesses who have concerns about meeting part or all of the Code.

Our intention is to support our business partners to meet the standards set out in this Code where appropriate. If you have questions about complying with the Code, please contact [governance@yougov.com](mailto:governance@yougov.com).

### Speaking up / Whistleblowing

If you have any concerns or would like to report an incident that violates this Code, please refer to the summary of our [Whistleblowing Policy](#) or contact the Whistleblowing Officer directly at [whistleblowing.officer@yougov.com](mailto:whistleblowing.officer@yougov.com).

## 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 Department	June 2022	Policy Created
1.1	Head of Compliance	August 2023	Policy Updated
1.2	ESG Manager	March 2024	Policy Updated

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