

Kantar Political Activities and Engagement Policy

Kantar and its companies engage in the political process on behalf of clients and to influence the political debate on issues that affect our own business interests

Political engagement is a legitimate activity when conducted responsibly, ethically and honestly. This policy applies to employees, directors and entities of all Kantar companies and to any third- parties involved in political activities on behalf of Kantar and its companies. It applies to all political activities whether carried out on behalf of clients or on behalf of Kantar and its companies.

Political activities may include: meetings, interactions and communications with government officials, legislators and other political organisations; undertaking client work designed to influence opinion on behalf of political parties, organisations and interest groups; political contributions; membership of business and trade associations that conduct lobbying on behalf of their members; and recruitment of employees from the public sector.

Principles for political engagement

Anyone involved in political activities on behalf of Kantar or its clients are expected to abide by all relevant laws and our Code of Business Conduct. They must uphold our commitment to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity.

Political activities should be conducted legally, ethically and transparently. All communication should be honest, factual and accurate.

Political activities should focus on issues that directly affect our business or, in the case of work for clients, on issues that directly affect our clients or their customers. Political activity should not be conducted for personal gain.

Kantar companies must not undertake client work that is intended or designed to mislead. We do not represent 'front groups' (organisations which purport to be independent NGOs but are controlled by another organisation for the purpose of misleading) and must ensure we are aware of who the underlying client is before taking on work.

Working with third parties

Any third-parties conducting political activities on behalf of Kantar or its companies must comply with this policy.

Kantar companies must conduct due diligence of third-parties before appointment, communicate our standards and monitor third-party compliance with our policies.

Political donations

Kantar and its companies in the EU are not permitted to make political donations. This includes cash, cash equivalents, loans, gifts, entertaining, free or below market value work, sponsorship of political events, and anything else that constitutes a transfer of value.

Political donations are donations to the following groups:

- a registered political party or a party that intends to participate in an election(s) to a public office; and
- an organisation whose activities may be regarded as intending to affect public support for any political party (as above) or any independent candidate(s) at an election for public office.

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Kantar companies in other jurisdictions are not permitted to make direct cash donations. Other political donations can only be made with the prior written approval of the Kantar Board. Donations must be reported to Kantar Legal before they are made to confirm they comply with this policy and to obtain the necessary approvals.

Political contributions should be used appropriately and in a balanced way so as to not disproportionately advantage any specific party or political viewpoint. Kantar must also apply our Anti-Bribery and Foreign Corrupt Practices Policy.

In some jurisdictions, activities such as attendance at political party conferences and events are classed as political contributions. Operating companies must go through the approvals process outlined above before making these types of contribution.

If any operating company is in any doubt as to whether a donation is political or is permitted, you must contact Kantar Legal.

Where political donations are permitted and have been made, the amounts will be disclosed by Kantar.

Penalties for illegal political donations or non-disclosure of permitted donations range from potential custodial sentences to the requirement for full reimbursement of donations.

Trade associations and memberships

Kantar and its companies are members of trade associations, business chambers of commerce and industry groups, which may undertake lobbying activity on behalf of their members.

It is important that all such organisations act honestly, ethically and transparently in their lobbying activities. Kantar should select organisations whose priorities and values are aligned with those of Kantar and which have robust governance processes. Kantar shall not support organisations whose priorities conflict with our own or whose actions could constitute a reputational risk to Kantar or our client.

Employment of current or former government officials

Kantar has clear procedures for the employment of serving or former politicians.

When recruiting new employees directly from elected office a 'cooling off' period of six months should be implemented, or such longer period as may be required in the jurisdiction in which a Group company operates. During the cooling off period, the new employee should not work on any projects directly related to their previous role or conduct discussions on behalf of the company with their former department.

Secondments between Kantar and its companies and government departments are permitted provided that a formal agreement is put in place and a review has been carried out to ensure the secondment will not create a conflict of interest.

Kantar companies must report secondments to Kantar Legal.

Raising a concern

Anyone with concerns about any political activities undertaken by Kantar companies should contact the Kantar Legal team or our confidential Right to Speak facility.

Responsibilities and compliance

The Kantar Board of Directors has ultimate responsibility for political activities.

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Our internal audit team assesses compliance with this policy as part of its Group-wide audit program. The audit results are reviewed by senior management.

This policy should be used in conjunction with other relevant policies. These include:

- Code of Business Conduct
- Sustainability Policy
- Human Rights Policy Statement
- Anti-Bribery and Foreign Corrupt Practices Policy
- Gifts and Hospitality policy