



Our policy on... Sanctions



At Kantar, we are committed to conducting business with integrity and in compliance with all applicable laws.

As part of this commitment, we have implemented and are continuing to develop and strengthen risk-based procedures to ensure compliance with applicable sanctions regimes.

This policy should be read in conjunction with [the latest Sanctions guidance on The Source](#) which always details the latest specific sanctions which may impact on Kantar's business. Applicable sanctions can change frequently and quickly so you should visit the guidance regularly, and especially when onboarding new clients or suppliers.

Introduction and commonly used terms

Sanctions prohibit doing business with sanctioned individuals, entities and jurisdictions. These are legal terms so it's worth explaining them here as they'll be used repeatedly through this policy:

Jurisdiction refers to a country, state or other geographic area where a particular set of laws or rules must be obeyed.

Entity refers to an organisation or a business. For Kantar, this will typically be a company or business, most likely a client or supplier.

Incorporated refers to the establishment or forming of a business in a way that is recognised legally.

01 What are sanctions?

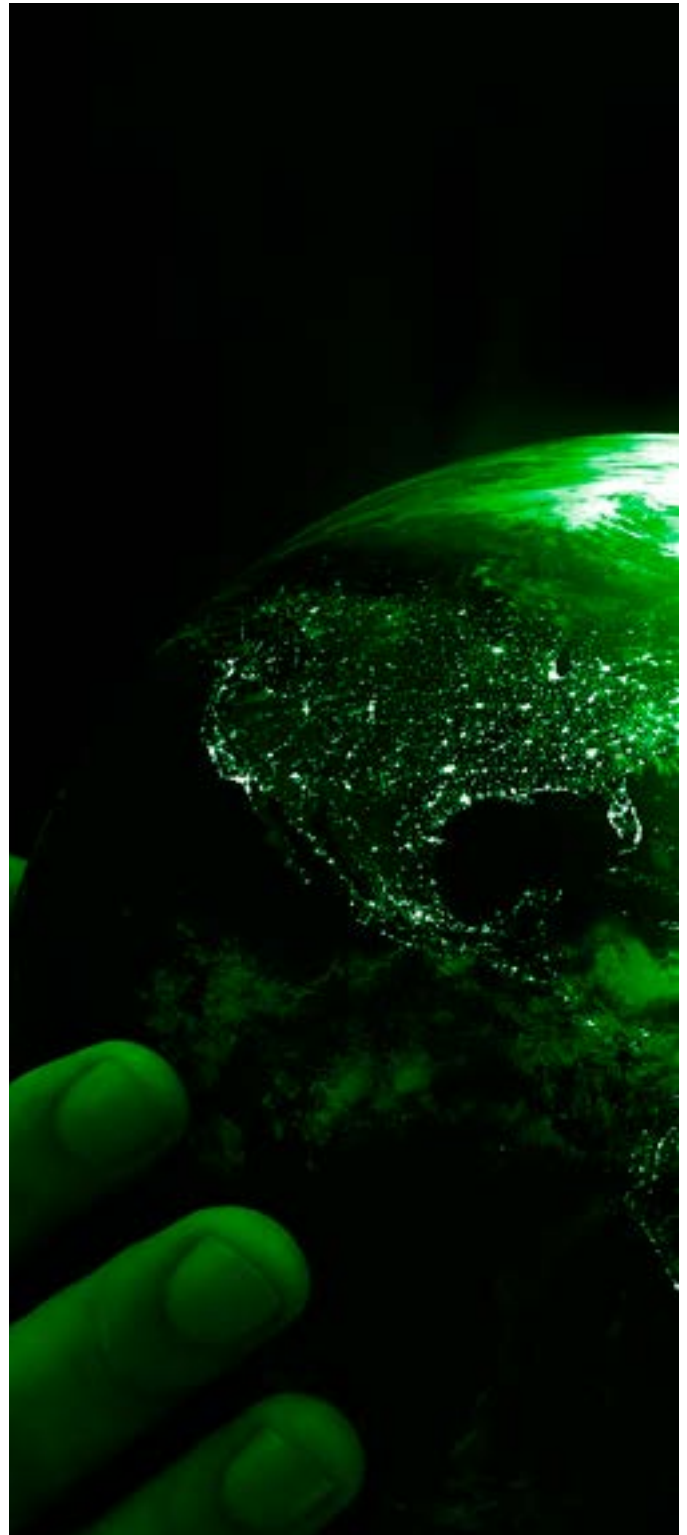
Sanctions are restrictive measures imposed on jurisdictions, entities and individuals for political, military or policy reasons. This means it is really important for us to know where and with whom we do business.

Sanctions are usually intended to influence the actions or policies of countries, entities, and individuals by imposing an economic cost on maintaining their existing position.

Sanctions affect Kantar's business as they prohibit providing payments, goods or services (or anything of value) to specified individuals and corporate entities. In addition, some jurisdictions are subject to a large number of restrictive measures, including, in some cases, broad bans on trade (sometimes referred to as an embargo). There is a high risk that doing business with or involving such jurisdictions may breach applicable sanctions.

Sanctions laws also prohibit indirect breaches of sanctions, as well as actions taken to assist/support sanctions breaches, or to get around sanctions by using intermediaries. As it may not always be immediately obvious that a business arrangement could fall foul of sanctions, it is important that you understand and comply with this policy and flag any concerns with the **Sanctions Team**.

Sanctions can also take the form of boycotts or export controls. If you are concerned about either of these specific measures affecting Kantar please contact the **Sanctions team** for further guidance.



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What's Kantar's policy?

Kantar cannot work with some people, businesses and groups as they are subject to international sanctions. Such individuals, groups and businesses are called **Restricted Parties** and we monitor who we work with to avoid them.

Some places, including both regions and countries, are subject to sanctions. These are called **Restricted Jurisdictions**, and Kantar does not work in these territories. This includes not working with third party suppliers in these areas.

Some places are subject to market or sector specific sanctions, but which only apply to areas of business that Kantar would not typically be involved with. Such places are called **Authorisation Jurisdictions**, and Kantar can potentially work in them as long as we are very careful in following the applicable rules.

In this context when we use the term work it's taken to cover selling to, buying from, consulting with and working on a pro-bono basis.

You can find the list of Restricted and Authorisation Jurisdictions on The Source. Check it often because it can change anytime.



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How does Kantar apply this policy?

- By restricting where we do business. We do not do business with or involving Restricted Jurisdictions or Restricted Parties. We allow dealings with or involving Authorisation Jurisdictions only where sanctions and compliance risks can be excluded or effectively managed
- By requiring third party suppliers to sign the Kantar Code of Conduct for Suppliers and including sanctions clauses in our commercial agreements
- By implementing procedures to manage risks associated with higher risk jurisdictions. We require Sanctions Compliance Questionnaires to be completed for business arrangements involving Authorisation Jurisdictions. The **Sanctions Team** undertakes checks to confirm whether the arrangements will breach applicable sanctions. This includes screening the parties involved.

You must not have any business contact with anyone in, or connected to, a Restricted Jurisdiction, unless approval has been granted by the **Sanctions Team**. This includes any individual or entity incorporated in, ordinarily resident in or located in such a country. You must inform the Sanctions Team immediately if you are intending to work with or have been approached by prospective clients or business partners in or connected to a Restricted Jurisdiction. It does not matter whether Kantar is itself based or physically located in the Restricted Jurisdiction.

To obtain approval for a business arrangement in, or connected to, an Authorisation Jurisdiction, you must complete a Sanctions Compliance Questionnaire with relevant details about the proposed business arrangement and send the questionnaire to the Sanctions Team. **The Sanctions Compliance Questionnaire** will be reviewed to confirm whether or not the proposed arrangement would breach applicable sanctions. The questionnaire is available on **The Source**.

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Your responsibilities in observing sanctions

We all have a responsibility to ensure that we are not in breach of this policy. You must:

- Make sure you know which jurisdictions are Restricted Jurisdictions and Authorisation Jurisdictions – check the lists on The Source, which will be updated when changes occur
- Contact the **Sanctions Team**:
 - **Each time** a request (new or repeat) from a client or business partner arises in connection with Restricted Jurisdiction or Authorised Jurisdiction, in each case **before submitting any proposal**
 - If you suspect that any potential or existing client or business partner is incorporated in, ordinarily resident in or located in a Restricted Jurisdiction, or is a Restricted Party
 - If you suspect any breach of this policy
- Attend all required sanctions-related training



In addition, you must not:

- Engage in or assist/support any business arrangements or transactions that involve any Restricted Jurisdictions or Restricted Parties in any way, either directly or indirectly, e.g. through a business partner
- Have any business contact with organisations in Restricted Jurisdictions by phone, email or in person
- Travel to any Restricted Jurisdictions for business purposes or log into any work systems if you are visiting any of these jurisdictions for personal reasons
- Progress any business arrangement that has been placed on hold due to sanctions issues
- Structure business arrangements to try to get around sanctions
- Provide reasons for a refusal if Kantar is unable to do business with someone as a result of this policy - check with **Legal** before sending any correspondence

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05 Worked Examples

Example One

A potential new client has approached Kantar to undertake a research survey in a number of different jurisdictions, including two jurisdictions subject to significant sanctions (e.g. broad trade bans). The client explains to a Kantar colleague that they will be providing the research findings to another company.

Firstly, it is a red flag that the potential client is not the end-customer, as this structure may be intended to conceal the involvement of a sanctioned party or country. The Kantar employee should check the identity of the end-customer before proceeding. Secondly, the colleague should check whether this policy prohibits doing business in any of the jurisdictions involved in the project and, if so, follow the guidance set out. Doing business with or involving such jurisdictions may breach sanctions and/or harm Kantar's reputation.

Example Two

Kantar has been referred a supplier for a new project. The supplier is reluctant to provide clear answers about their ownership information during Kantar's on-boarding checks. They also refuse to agree to sanctions compliance provisions in the supply agreement. As the new project only involves jurisdictions that pose very low sanctions risks, the Kantar colleague decides to enter into the agreement with the supplier. It transpires that the supplier is wholly owned by a sanctioned party.

Refusing to provide information required for on-boarding checks is a sanctions red flag. Some business partners may not want to provide ownership information, as sanctions prohibit doing business with companies that are owned or controlled by a sanctioned party. It is also a red flag for a supplier to refuse to agree to sanctions compliance clauses. Given these concerns, the Kantar colleague should not have proceeded with the transaction even though the project involved low risk jurisdictions. By doing business with a supplier owned by a sanctioned party, Kantar will have breached sanctions.

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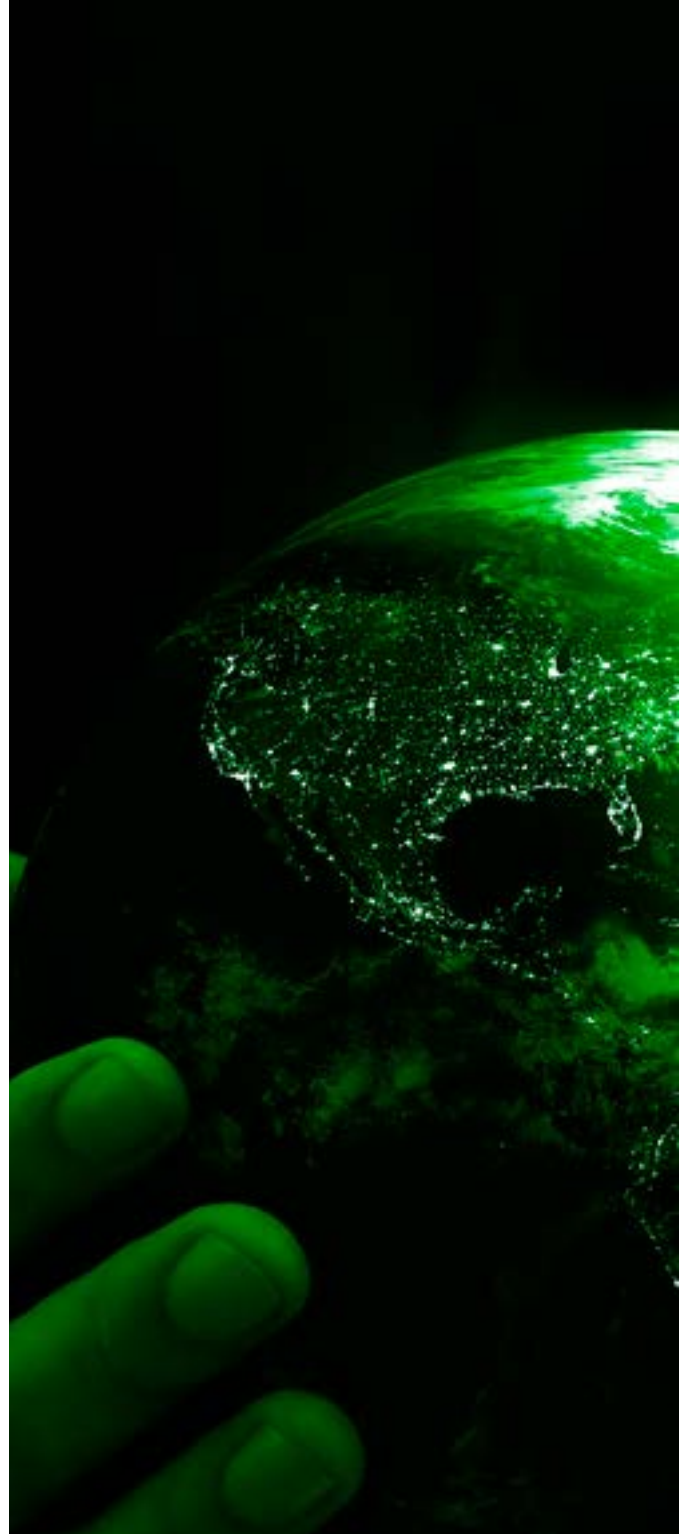
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Consequences of breaching sanctions

A breach of sanctions laws or rules may constitute a breach of the law of the country which has imposed the sanctions. While punishments for this vary by Jurisdiction, individuals can face civil or criminal proceedings which may result in civil and/or criminal penalties, significant fines and even imprisonment. Kantar could be exposed to civil or criminal liability too together with financial and reputational damage.

In addition, any breach of this policy may result in disciplinary action being taken including, dismissal or termination of a contingent worker's engagement.

This policy is not part of your employment contract or contract for services and Kantar can change or update it from time to time.



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Key contacts:

If you are unsure about any aspect of this sanctions policy and, in particular, if you believe that they may apply to a project or engagement you are working on, please contact the **Sanctions Team** for further advice. You must not proceed further without doing so.

If you have concerns about either a potential or existing breach of a sanction and wish to report it anonymously, please use our **Right to Speak** service.

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