

Our policy on... Right to Speak

For all Kantar people

Kantar is committed to:

- providing and maintaining a culture of open and accountable management
- conducting business ethically, honestly and within the spirit and letter of the law
- facilitating open and honest communications whereby all colleagues feel able to raise concerns about actual or potential violations of our internal policies, the law or our regulatory obligations, and trust that any reports raised will be considered and addressed without retaliation.

That's why, at Kantar, we encourage our colleagues to raise any concerns they have about the way that Kantar operates and conducts its business, or about any suspected danger or wrongdoing. This keeps us all accountable, and helps us continually improve our business and our culture.

The legal systems of some countries may have different requirements and give individuals who report issues different protections than Kantar policy. In the event of a divergence between Kantar's Right to Speak policy and local law, local law will prevail. You can find a list of countries and the different protections offered [here](#).

01 What's included in this policy?

This Policy summarises:

- the kind of issues you should raise via our Right to Speak process
- how to make a report
- how reports will be treated by Kantar.

Before we get into the details of the policy, it's useful to clarify what we mean by certain terms. In this Policy references to the following terms shall have the meanings set out below:

"Kantar" means each company in the Kantar group of companies and affiliates.

"Report" means an oral or written disclosure of information or a reasonable suspicion, about an actual or potential breach, which has occurred or is very likely to occur. It also covers an attempt to conceal such breach.

"RTS" means Right to Speak.



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Who does this policy apply to?

This Policy applies to:

- All prospective, current and former employees and other individuals working for or providing services to Kantar, such as our **contingent workers** and our casual workers, collectively known as our colleagues
- All our prospective, current and former interns, work experience students
- All shareholders
- Board members (including non-executive directors)
- Employee, trade union or works council representatives who have advised or represented an individual making a report
- Any individual working under the supervision or control of our contractors, subcontractors or suppliers
- Any person assisting a reporter in the reporting process, and a colleague or relative (who may suffer retaliation)
- A legal entity owned or connected with, a reporting person

For clarity, this Policy does not form part of any contract of employment or engagement and Kantar may withdraw or amend it at any time.



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What kind of concerns can be raised via Right to Speak?

Right to Speak can be used to report **any concerns** you have about the way that Kantar operates and conducts its business, or about any suspected danger or wrongdoing. This includes any actual or suspected breach of the **Kantar Policy Book**, the law or our regulatory requirements. For example, this could include reports about any of the following, but please note that this is not an exhaustive list:

- Any breach of applicable law or our legal or regulatory obligations
- Criminal activity
- Conflicts of interest

- Misconduct or breach of Kantar policies
- Dangers to health and safety
- Damage to the environment
- A miscarriage of justice
- Financial fraud (including any type of fraud, any breach of the rules or regulations of the US Securities and Exchange Commission, and any US federal law relating to fraud against shareholders), theft, money laundering, terrorist financing or mismanagement
- Discrimination or harassment
- Corruption, bribery or tax evasion
- Unethical or inappropriate behaviour
- Protection of privacy and personal data, security of our networks and information systems, and any breach of our data protection and/or cyber securities policies and procedures
- The deliberate concealment of any of the above matters.



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How do I report a concern via Right to Speak?

If the issue affects you personally (e.g. it is about your employment with Kantar or the way that you are being treated at work), you may wish to consider initially raising your concern with your line manager, another senior manager or Human Resources. You may request a meeting for this purpose or send them an email or call. They may be able to agree a way of resolving your concern quickly and effectively without you having to raise a report through the RTS process or relevant local policy. You will have the opportunity to approve or correct any minutes taken of any meeting or call.

We appreciate and recognise that following this approach is not always easy, and may not be appropriate given the nature and/or gravity of the concern. In this situation, Kantar has an entirely independent process for raising reports via our **independent Global Right to Speak Reporting Service and Helpline (EthicsPoint)**.

This is operated by an external third party and is completely outside Kantar. It facilitates reports being

made in a safe and confidential way. Filing a report via EthicsPoint can be done in one of two ways:

- **Web Reports:** Staff can file a confidential report through www.righttospeak.ethicspoint.com
- **Global Telephone Helpline:** Staff can call the Right to Speak Helpline on the telephone numbers listed at the bottom of this Policy (all are toll free, unless stated otherwise). Reports can be made via the Helpline 24 hours a day. Your call will be answered by an appropriately trained, local language speaking individual who will ask you a series of questions and record your response in a report.

In addition, if your market has a separate local reporting channel you may raise a concern with that. Details of markets with separate local channels are available [here](#). This will guide you as to whether this local reporting channel should be used to make your report and whether or not the report will be handled locally or centrally by our RTS investigations team. Your consent may be sought to share the report and outcome with other group companies.

Unless local law stipulates otherwise, or it is otherwise inappropriate due to the nature of the report and the identity of the alleged perpetrators, in most cases reports are passed to appropriate individuals in the market or region to which the concern relates to investigate. Reports are not investigated by EthicsPoint or Navex (the company that operates this service). EthicsPoint is merely the independent and confidential platform through which reports can be made.

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What information should be provided when making a report?

If possible, and only if your personal safety and time allows, you should gather as much information and/or evidence about your concern as possible before making your report. If your concern relates to conduct which has occurred over a period of time, it would be helpful if you are able to collate as much evidence demonstrating this as possible.

When making the report you should expect to provide the following information:

- Your division within Kantar or relationship to Kantar
- Name of the person(s) to whom the report relates
- Date of the incident
- Place/location of the incident
- Specific details about your concern
- Any other witnesses involved
- The reasons why you consider that this is a reportable concern
- Your thoughts on the particular conduct issue
- The desired outcome you are seeking as result of making the report
- Any other relevant matters.

Individuals making a report do not need to show absolute proof of their suspicions in order to raise a concern under Right to Speak. They must, however, have **reasonable grounds to believe, given the circumstances and the information available to them at the time of reporting, that the matters they are reporting are true.**

Personal data will be collected, processed and used only for handling the reported concern. Details of how your personal data is handled are set out in the **RTS Privacy Notice.**



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Do I have to give my name?

Where appropriate, and subject to local law restrictions, we encourage reporters to provide their contact details if this is possible. This is so that the investigating manager can liaise with you to get relevant information to conduct a purposeful and meaningful investigation, recommend appropriate remedial and/or follow up action and also let you know the outcome, if this is appropriate. Every concern raised, whether via the Helpline or online, will be treated confidentially, and will be promptly and thoroughly reviewed, and where appropriate, investigated.

If reports are made anonymously, Kantar can only rely on the information which is initially disclosed in the web report or taken by the Helpline call handler. A lack of sufficient information in the initial report may mean that Kantar will not be able to investigate properly to adequately address the concern and improve our working practices and culture. Even within those constraints, Kantar makes every effort to investigate anonymous reports as far as possible.

Please note that if a report is made anonymously we will not be able to contact you directly. However, we can raise comments, follow up and provide updates via the Right To Speak Portal which you should check weekly. You will not receive a notification that this information has been updated but you can access this information by returning to the online portal. If the investigator(s) raise questions via the comments section but they are unanswered by the report the investigation will continue based on the information already provided.

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What happens next?

All reports raised via the Helpline or online are notified to designated members of our RTS investigations team. Receipt of your report will be acknowledged within seven days. An initial assessment will be carried out, and a decision made on the investigative approach. This may involve appointing an external resource or referring the matter to an appropriate external body, such as the police, regulatory agencies or professional firms. Reports will generally be investigated by investigator(s) based in the market or region where the alleged incident occurred. If the reporter has a concern about this approach, they should specify this at the time of making their report.

So far as possible, the reporter will receive feedback in relation to their report within a reasonable timeframe and by no later than 3 months after the acknowledgement of receipt of the report. Feedback may include:

- Whether an investigation will take place and if not, why not
- Whether it is appropriate in the circumstances for the matter to be dealt with under a policy in-market that aims to resolve complaints and disputes the individual reports
- An indication as to any other proposed way forward
- An estimate as to how long an investigation might take
- The result of any investigation i.e. whether the report was substantiated, not substantiated, incomplete or deemed frivolous
- Any recommended remedial action or follow up action to be taken
- If you choose to remain anonymous, we may provide details of a local contact that you can speak to should you wish to provide more information.

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08 Confidentiality and protection for individuals raising a report

Kantar is committed to ensuring that employees feel able to raise concerns openly under Right to Speak, without fear of reprisal, retaliation or victimisation and with the support of Kantar.

All investigations will be carried out confidentially to the fullest extent possible and with the appropriate level of sensitivity. Only a limited number of individuals will be aware of and/or involved in the investigation, unless Kantar is otherwise required or compelled by law to disclose information. Those knowing the identity of the individual raising the report will therefore be kept to a minimum.

Kantar does not tolerate any form of retaliation or victimisation in relation to a report being raised or involvement in a Right to Speak investigation.

This is not only reprehensible and contrary to our culture, but it could give rise to legal action being taken against Kantar.

Retaliation includes not only actions taken by Kantar or any of our colleagues, but also actions taken by our clients or the recipients of our services and anyone working for them.

Examples of retaliatory action for making a report which will not be tolerated by Kantar include:

- Dismissal, suspension or any other disciplinary sanction such as a warning
- Demotion or withholding of a promotion

- Transfer of duties, change of location of place of work, reduction in wages, change in working hours
- Withholding of training
- A negative performance assessment or employment reference;
- Bullying or harassment
- Discrimination
- Failure to convert a temporary employment contract into a permanent one where the worker had legitimate expectations that he or she would be offered permanent employment
- Failure to renew, or early termination of, a temporary employment contract
- Reputational damage
- Blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry
- Early termination or cancellation of a contract for goods or services
- Cancellation of a licence or permit
- Psychiatric or medical referrals.

Please note that this is not an exhaustive list.

Any retaliatory action will be taken extremely seriously and may result in a separate investigation and appropriate disciplinary sanctions against the perpetrator being taken. This is whether or not the initial report is found to be true.

If you believe that you have suffered or are the subject of retaliatory action please inform your investigation manager immediately or raise a report via this RTS process. This will then be discussed with the Kantar Legal Team.

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External reports

Please take care before discussing issues you are considering reporting outside of Kantar as this may affect your protection under our Right to Speak policy.

It would not normally be appropriate for colleagues to discuss concerns about Kantar externally, unless the procedures detailed in this Policy have first been followed. This does not prevent you from discussing your concern with a medical professional for the purposes of treatment, your employee representative for the purposes of support, or otherwise where required by law. Local law may determine the extent to which a reporter is able to report externally.

An employee who does not use this Policy and makes a disclosure to an external third party where they are not permitted to do so may be in breach of confidentiality duties owed to Kantar. This may lead to the employee being disciplined, and they may also lose their statutory protection i.e. their legal right to claim in respect of any detriment suffered or retaliatory action for raising Right to Speak concerns. It is noted that in some instances (e.g. Sarbanes-Oxley and the Dodd-Frank Act in the US) statutory protection is only available if reports are made to external third parties.



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10 Contacts and Right to Speak EthicsPoint Helpline

For a list of telephone numbers in your market or country, please visit our [Right to Speak page](#) on The Source.

For any queries or concerns about this Policy, please contact our Global Head of Compliance, Alison Gallagher: alison.gallagher@kantarc.com



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