Policy Statement:
Anti-Money Laundering, Counter-Terrorist Financing & Anti-Fraud

This statement summarises ITV's approach to preventing fraud and money laundering. It is separate from the full policy, which sets out detailed legal context, procedures and responsibilities.

Fraud is the use of deception to obtain an unjust or illegal advantage. Money laundering is the process of putting the proceeds of criminal activity into the regular economy to "clean" them and disguise their origins. At ITV, we have zero tolerance for fraud, money laundering and other forms of economic crime. We are committed to doing business ethically, lawfully and in compliance with anti-fraud and anti-money laundering laws in the UK and internationally. ITV will not tolerate anyone acting for us or on our behalf committing fraud or money laundering, and we must all take reasonable steps to prevent this from happening.

What are we trying to achieve?

We want to prevent anyone working with, for or on behalf of ITV from engaging in fraud, money laundering or financial wrongdoing. Our goal is to comply with the law, protect ITV, and act with integrity in all financial dealings so that we can protect our people and the company from legal, financial and reputational risks.

Why does it matter?

Fraud and failing to prevent fraud are criminal offences. So is money laundering. ITV and anyone involved in these or other economic crimes could face serious consequences, including criminal prosecution, unlimited fines, reputational damage and termination of contracts. Even ignoring suspected misconduct can be enough to trigger liability.

What are our roles?

Finance and Corporate Compliance define the policy and guidance to support the policy objectives and set expectations for the business. Managers must make sure their teams understand the risks and complete mandatory training. Everyone must be alert to red flags, follow ITV's procedures, and report any concerns.

What do we expect from you?

These key points are not intended to be exhaustive. For full details, please read the policy.

Do	Don't
• Complete annual mandatory training on economic crime and fraud • Carry out due diligence when dealing with third parties and include appropriate wording in contracts ***(speak to Legal & Business Affairs for guidance)*** • Keep accurate financial records and follow ITV processes for payments • Be alert to red flags such as unusual payment requests, offshore transfers, duplicate invoices or last minute changes of contracting parties • Report any suspicious behaviour immediately to the Head of Corporate Compliance	• Ignore unusual or suspicious requests or pressure to bypass controls • Knowingly approve or process unexplained or irregular payments • Disclose your concerns to someone you suspect of wrongdoing (this could be a criminal offence) • Assume someone else will raise the alarm: if you see something, say something • Engage with third parties unless you've carried out due diligence and suitable contractual protections are in place

Who can you speak to?

If you have any questions or concerns, contact **Legal & Business Affairs**, **Finance** or the **Head of Corporate Compliance**. You can also raise concerns anonymously through ITV's **Speaking Up channels**. You will not face retaliation for reports made in good faith - even if you turn out to be mistaken.

Anti-Money Laundering, Counter-Terrorist Financing and Anti-Fraud Policy

Policy Owner:
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Policy Manager: Ed Cotton
Approver: ITV Risk Committee
Approval date: 29 April 2025

1. Introduction

ITV is committed to maintaining the highest standards of ethical conduct and this commitment includes preventing economic and financial crimes such as **fraud** and **money laundering**.

In line with ITV's zero-tolerance approach to economic crime, this policy establishes roles and responsibilities and how we expect those working with us, for us or on our behalf to behave. It provides information and guidance on how to recognise, report and address any suspicious activities or behaviours.

This policy should be read in conjunction with ITV's policies on: Anti-Bribery & Corruption; the Prevention of Facilitation of Tax Evasion and Sanctions.

The ITV Executive Committee has overall responsibility for overseeing compliance with this policy.

2. Who does this Policy apply to and what are your Responsibilities?

This is a globally-applicable policy. It applies to everyone working with, for or on behalf of ITV, or providing services to ITV, at all levels, including employees (whether permanent, fixed-term or temporary), freelancers, consultants, contractors, trainees, secondees, agency staff, volunteers and interns, whether located in the UK or internationally.

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of potential economic crime are the responsibilities of everyone working with us, for us or on our behalf. Everyone is required to avoid any activity that might lead or amount to a breach of this policy. You must notify ITV as soon as possible if you believe or suspect that a conflict with, or breach of, this policy has occurred or may occur in the future. Please refer to the Speaking Up section of this policy for details of how to raise any concerns.

3. What are the Consequences of Non-Compliance?

The potential consequences of being involved in economic crime may include criminal penalties for both individuals and companies, for example imprisonment and/or unlimited fines.

In some circumstances, a company's "senior managers" (including its directors) could be convicted of an offence - and also cause the company to be convicted of an offence - where they are deemed to have given their consent to an economic crime. Importantly, it is possible that being aware of criminal activity and omitting to act might be regarded as consent and lead to prosecutions, fines and/or imprisonment.

ITV takes adherence to this policy seriously. A breach of this policy may result in disciplinary action (which may include reprimand, probation or suspension), termination of your contract with ITV and/or legal action.

4. Fraud

What is Fraud?

Fraud has a broad scope. It means the use of deception to obtain an unjust or illegal financial or other advantage. Individuals may use false representation, concealment of information or abuse a position of trust to achieve an unfair or unlawful advantage.

ITV can be the target of fraudulent activity but fraud can also be carried out by ITV employees as well as its consultants, contractors, and/or any other parties acting on ITV's behalf. We therefore all have a role to play in protecting ITV from attempts at defrauding the organisation and highlighting any fraudulent activity by those within the business which could have serious legal and reputational implications for ITV.

ITV Policy on Theft and Fraud

ITV will not tolerate theft or fraud and anyone proven to be committing theft or fraud may be subject to disciplinary action and criminal prosecution.

If you suspect someone of theft or fraud, please report it to your line manager or People contact immediately. They will then inform senior management and Legal and Business Affairs. An investigation may then be carried out by appropriate personnel. If there are reasonable grounds for suspicion, it may be appropriate to suspend the individual(s) concerned. Other disciplinary action may be taken once the investigation is complete.

If the investigation finds evidence of theft or fraud, legal advice will be taken from Legal & Business Affairs and, where appropriate, the police may be notified so that further action can be taken. After the investigation, a report will be issued outlining where the theft or fraud occurred and identifying any relevant controls. This may include recommendations for changes to processes and/or systems so that theft or fraud can be prevented from occurring again.

Failure to prevent Fraud

Under UK law, the failure to prevent fraud is a criminal offence. The offence holds organisations to account if they or their clients benefit from fraud committed by their employees or "associated persons" and can apply internationally.

Organisations will commit the offence if an "associated person" commits fraud with the intention of benefiting: (a) the organisation; or (b) any person who receives services from the organisation. It does not matter if the organisation was unaware of the fraudulent conduct. The only defence would be that the organisation had in place reasonable procedures to prevent fraud.

As with bribery and preventing the facilitation of tax evasion, an "associated person" will be anyone who is an employee, agent or subsidiary of the organisation, or anyone who performs services for or on behalf of the organisation. This could include, therefore, agents, intermediaries and consultants, whether they are employed by ITV or not. If convicted, an organisation can receive an unlimited fine.

5. Money Laundering

What is Money Laundering?

Money laundering is the process by which money obtained through criminal activity is put into the economy to "clean" it and disguise its origins.

Money laundering is made up of three main stages:

- **Placement**: The criminal funds are introduced into the financial system. This could be through depositing them into bank accounts, purchasing assets or using the funds for other financial transactions;
- **Layering**: The money is moved through multiple transactions, converted into different forms, or transferred between countries. This makes it difficult to trace the money back to its criminal source; and
- **Integration**: In the final stage, the “clean” money is integrated back into the economy and withdrawn by the criminal without suspicion.

A criminal could seek to use a financial transaction with ITV in any of these stages. There is potential for illicit funds to be disguised as legitimate payments or expenses within ITV’s financial transactions.

ITV Policy on Money Laundering

ITV has a zero tolerance policy towards money laundering and is committed to establishing and maintaining effective arrangements to prevent and detect attempts to launder money using financial transactions with ITV.

You must be reasonably satisfied as to the identity of all third parties with whom you are doing business (including suppliers, contractors, partners and customers) and follow requirements for obtaining and retaining satisfactory evidence of identity.

For higher value / higher risk suppliers (as defined in the Procurement policy), you should engage the Procurement team to carry out pre-contract due diligence.

For other types of third parties, you must carry out pre-contract due diligence with the support of your Legal & Business Affairs team before engaging with them or at contract renewal.

You could be committing an offence if you suspect money laundering, or if you become involved in some way and do nothing about it. If you suspect that money laundering activity is taking place, or has taken place, or if you become concerned about your involvement, you must disclose it as soon as possible to the Head of Corporate Compliance or the Chief Financial Officer.

Tipping Off

Whenever you know of, or suspect, money laundering, you must report these concerns to the Head of Corporate Compliance or the Chief Financial Officer as soon as possible. You must not give the individual you have concerns about any cause to realise that you have concerns. This might "tip them off" to the fact they may be under investigation, which is a criminal offence.

6. Red Flags

Economic crime, including fraud and money laundering, could occur at any point in your working day and you must therefore be vigilant at all times. However, there are certain activities you may undertake, and certain points in time, when you must be particularly vigilant because the risk of economic crime occurring could potentially be higher.

As the primary goal of economic crime is financial gain, you should be especially vigilant when involved in financial transactions.

Red flags are warning signs or indicators that suggest the possibility of criminal activity and can include:

- **Cash transactions**: Cash deposits, withdrawals, or payments that are out of the ordinary for the company's business operations.

- **Inconsistent supplier invoices**: Invoices from suppliers that are not consistent with usual pricing, services, or terms.

- **Overbilling and double payments**: Instances of overbilling, duplicate payments, or multiple payments for the same services.

- **Unauthorised or unreported side deals**: Deals or arrangements involving money or assets that are not properly documented or disclosed.

- **Offshore transfers**: Movement of funds to or from high-risk offshore jurisdictions without a clear business purpose.

- **Overly complex corporate structures and payments to unknown entities**: Payments to unfamiliar individuals or companies with no obvious connection to the production activities.

- **Time pressure:** If a third party is placing undue time pressure on you, e.g. saying that they do not have time to complete due diligence checks and if they cannot start work now they will not be able to commit to a project, this should raise suspicions.

While the presence of one or more red flags does not necessarily confirm the existence of economic crime, they should prompt further scrutiny.

REMEMBER: The list of red flags above is non-exhaustive. If something doesn't feel right, you should discuss your concerns with your line manager, your People contact, Finance, Legal & Business Affairs or the Head of Corporate Compliance.

7. Contractual Protections

You should ensure that contractual arrangements with third parties include suitable and sufficient representations and warranties requiring the third party to comply with applicable anti-money laundering and anti-fraud laws and regulations. These types of representations and warranties are generally included as part of ITV's standard contractual terms, but please consult with Legal & Business Affairs if in any doubt.

8. Record Keeping

ITV businesses must keep financial records and have appropriate internal controls in place which evidence the business reason for making or receiving payments to or from, third parties. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties should be prepared and maintained with strict accuracy and completeness.

9. Training

All ITV employees and other individuals requested to do so must complete ITV's annual mandatory training modules on Economic Crime and Fraud and the Code of Ethics & Conduct.

10. Monitoring and Review

ITV will monitor the effectiveness and review the implementation of this policy at least annually, which will include consideration of its suitability and adequacy.

11. Speaking Up

If you have any concerns regarding a breach of this policy or how the policy is being applied in practice, you can raise them through ITV's Speaking Up channels. ITV has a Speaking Up policy to help you raise any concerns in the right way (including anonymously, if you wish). It can be found **here**.

Any genuine concerns will be investigated properly and the identity of the person raising the concern will be kept confidential. Anyone raising a concern in good faith will not be criticised or penalised in any way, even if it is shown, after investigation, that they were mistaken. Any form of retaliation, reprisal or victimisation against anyone who has raised a concern will not be tolerated and will itself be treated as a serious disciplinary matter.

12. Questions

If you are unsure whether something amounts to an offence as outlined in this policy, suspect a breach of this policy by anyone in relation to their work for ITV, or have any other queries relating to this policy, you should discuss your question with Legal & Business Affairs or the Head of Corporate Compliance.

Review History

Version	Date	Author	Summary of changes
April 2025	29.04.25	Ed Cotton	Updates to wording and for alignment with ECCTA 2023.