



AB&C, Economic Crime and Sanctions Guidance for Third Party Productions in High Risk Countries

Overview

If your production involves travelling to or filming in a **high risk country**, you will face increased risks around **bribery, corruption, economic crime** and **sanctions**.

If your location is listed in Appendix 1, please follow this guidance to help you manage those risks.

Remember that ITV takes a **zero-tolerance approach** to bribery, corruption, economic crimes such as fraud, money laundering and tax evasion, and sanctions breaches. We work to high standards of **integrity** and **professionalism** wherever we operate. Maintaining these standards in high-risk environments is essential because it helps to protect colleagues and the company from harm.

As well as the topics covered in this note, you may need to consider other operational, legal and compliance risks relevant to your production. Follow country-specific guidance and speak to your ITV contact, who will liaise with our **Global Risk Operations** and **Legal & Business Affairs** teams as needed.

Bribery, Corruption and Economic Crime

ITV's policies on **Anti-Bribery & Corruption, Anti-Money Laundering and Anti-Fraud** and **Tax Evasion** are available on [ITV's Commissioning website](#). They apply to everyone working with, for or on behalf of ITV. This includes local contacts such as fixers, scouts and agents, because ITV can be **legally responsible** for their conduct in certain situations.

Please make sure that you read and follow these policies. Remember these **key points**:

DO	DON'T
• Carry out due diligence on third parties and include appropriate wording in contracts. • Keep accurate financial records, ask for invoices and receipts, and follow approved processes when making payments. • Report any red flags, concerns or suspicious behaviour immediately. • Make sure your team is up-to-date with relevant training.	• Engage in any conduct that could directly or indirectly violate the law or ITV policy. • Offer, pay or accept any bribes to or from anyone. • Make any facilitation payments (unofficial fees to speed up routine bureaucratic processes) unless your safety or security are at risk. • Offer gifts or hospitality to, or accept them from, government or public officials.

Sanctions

Sanctions are financial or trade restrictions placed on companies, individuals, groups, industries or countries by national governments or international bodies such as the EU or UN. They can create serious **legal risks** as well as **practical issues** regarding travel and payments.

ITV's **Sanctions** policy is available on [ITV's Commissioning website](#). Appendix 1 below contains a list of **sanctioned countries** (i.e. countries where certain companies, individuals or activities have been sanctioned).



Remember that if your production involves a sanctioned country, you must carry out **sanctions checks** on any individuals or companies you intend to work with. ITV's **Legal & Business Affairs** team can support you with this if necessary.

Terrorism

Some countries, territories or regions are controlled by groups that have been designated as **terrorist organisations** by the UK, US, EU or UN. Examples include: Afghanistan, Gaza, Iran, Yemen, Somalia, Lebanon, Colombia, Peru and Venezuela.

These locations pose a **higher level of risk** because transacting with terrorist groups or their representatives, even indirectly, is prohibited under terrorism laws and in some cases sanctions laws too.

If this is a risk for your production, carry out **due diligence**, including **sanctions checks**, on all local third parties you plan to work with. Do not make or receive payments to or from individuals or companies affiliated with terrorist groups. If you are requested to do so, report it immediately.

What does this mean for my Production?

Bribery, corruption, economic crime and sanctions can create challenges for teams operating in high-risk locations. For example:

- **Customs and checkpoints:** You may need to pass through customs or checkpoints to get equipment and crew into and out of a location. These can be points for bribery demands, especially if there are issues with travel documents or filming permits.
- **Local officials:** Local officials or authorities may demand facilitation payments (unofficial fees) to carry out their duties or expedite routine services. The risk is higher if the location is controlled by a terrorist organisation, where any such payments risk breaching sanctions and terrorism laws, as well as being illegal bribes.
- **Informal or unregulated economies:** In some locations, parts of the economy may operate informally. This can make it harder to stay legally compliant and increases the risk of unknowingly engaging in corrupt practices.
- **Sanctions:** Travel or filming may be restricted in sanctioned countries. There may also be import or export bans, affecting production equipment; and banks may scrutinise transactions and be reluctant to process payments, making it harder to pay local fixers or crew.

Practical Steps

If your production involves a high-risk location, follow these steps to help manage the risks so that you can continue to work safely:

- **Briefing:** Explain ITV's zero tolerance approach to bribery, corruption and economic crime to all local contacts and crew, and brief them on ITV's ethical standards (as explained in the [Code of Ethics & Conduct](#)). No one involved with the production should breach ITV's policies or engage in any illegal conduct.
- **Local contacts:** Work closely with trusted in-country contacts who understand the local context, can build relationships with local communities and stakeholders, and can advise on how to operate on the ground. ITV can be held legally responsible for their actions in some circumstances, so carry out thorough background and social media checks, obtain references before you engage them, and ensure you have the right contractual protections in place. Oversee their activities to help ensure they are in line with ITV's requirements.

- **Plan your movements:** Avoid checkpoints and unnecessary interactions with local officials if possible. Travel only with essential documents, avoid transporting sensitive materials, and follow agreed conduct protocols. Develop a pre-agreed script for responding to questioning by authorities to ensure consistency. Where possible, build enough time into your planning to allow for delays so that you are not under time pressure to make facilitation payments.
- **Documents:** Carry electronic copies of all permits, permissions, applications and correspondence with local authorities in case you need to demonstrate compliance. This will help to reduce the risk of being harassed for unofficial fees.
- **Facilitation payments:** If you are faced with delays or pressure to pay unofficial fees, be polite but firm in your refusal. The only exception is if you are under duress - for example, there is a risk of physical harm or illegal detainment. If you are requested or required to make a payment, report it to ITV's **Legal & Business Affairs** team as soon as it is safe to do so.
- **Contributors:** Contributors should not be paid for participating in a production if they are a government or public official, sanctions target, or member of / affiliated with a terrorist group. Carry out thorough background and social media checks so that you understand any views or affiliations that could impact the integrity of the production or ITV's reputation.
- **Payments and record-keeping:** Any payments to local fixers, producers or contacts should be made by official bank transfer. Avoid cash payments, which can be a red flag for bribery, fraud, money laundering and tax evasion. Keep a detailed record of all payments and transactions and ask for invoices and receipts where possible.
- **Gifts & hospitality:** Follow the principles in ITV's [Anti-Bribery & Corruption policy](#). Gifts and hospitality must be reasonable, justifiable and not intended to influence a decision improperly. Gifts and hospitality involving government or public officials are prohibited.
- **Incident reporting and raising concerns:** If you encounter a situation involving bribery, fraud, money laundering, tax evasion or sanctions breaches, keep a detailed, factual record of what happened. If something doesn't feel right, speak up. Report any issues, incidents or concerns to ITV's **Legal & Business Affairs** team, or use [SafeCall](#) if you wish to report confidentially.

Appendix 1 - List of High Risk and Sanctioned Countries

** Sanctioned*

Afghanistan *	Equatorial Guinea	Malawi	Serbia *
Albania *	Eritrea	Maldives	Sierra Leone
Algeria	Eswatini	Mali *	Slovakia
Angola	Ethiopia *	Malta	Solomon Islands
Argentina	Gabon	Mauritania	Somalia *
Armenia *	Gambia	Mauritius	South Africa
Azerbaijan *	Georgia *	Mexico	South Sudan *
Bangladesh	Ghana	Moldova *	Sri Lanka
Belarus *	Guatemala *	Mongolia	Sudan *
Benin	Guinea *	Montenegro *	Suriname
Bolivia	Guinea Bissau *	Morocco	Syria *
Bosnia and Herzegovina *	Guyana	Mozambique	Tajikistan *
Brazil	Haiti *	Myanmar *	Tanzania
Bulgaria	Honduras	Namibia	Thailand
Burkina Faso	Hong Kong *	Nepal	Timor-Leste
Burundi *	Hungary	Nicaragua *	Togo
Cambodia	India	Niger *	Trinidad and Tobago
Cameroon	Indonesia	Nigeria	Tunisia *
Central African Republic *	Iran *	North Korea *	Turkey *
Chad	Iraq *	North Macedonia *	Turkmenistan *
China *	Israel	Oman	Uganda
Colombia	Jamaica	Pakistan	Ukraine *
Comoros	Jordan	Palestine *	United Arab Emirates
Congo	Kazakhstan *	Panama	Uzbekistan *
Costa Rica	Kenya	Papua New Guinea	Vanuatu
Cote d'Ivoire	Kosovo *	Paraguay	Venezuela *
Croatia	Kuwait	Peru	Vietnam
Cuba *	Kyrgyzstan *	Philippines	Yemen *
Cyprus	Laos	Qatar	Zambia
Democratic Republic of Congo *	Latvia *	Romania	Zimbabwe *
Djibouti	Lebanon *	Russia *	
Dominican Republic	Lesotho	Rwanda	
Ecuador	Liberia	Sao Tome and Principe	
Egypt	Libya *	Saudi Arabia *	
El Salvador	Madagascar	Senegal	