Policy Statement: Sanctions

This statement summarises ITV's approach to compliance with sanctions laws and regulations.

Sanctions are trade or financial restrictions that are put in place by national governments or international bodies against target countries, entities, individuals, groups or industries. ITV is committed to complying with all applicable sanctions, including those imposed by the UK, US, EU and UN and the national governments of countries where ITV companies are located. We will not participate in any activity that risks breaching sanctions or exposes ITV or its people to enforcement action.

What are we trying to achieve?

We want to prevent anyone working with, for or on behalf of ITV from engaging in prohibited activity. We want you to be aware of how sanctions apply to our work, especially when working internationally or with third parties, so that we can prevent ITV group companies from breaching sanctions and protect our people and the company from legal, financial and reputational risks.

Why does it matter?

Non-compliance with sanctions is very serious: it may result in civil or criminal penalties (including fines) and cause ITV to breach its banking and financing arrangements, materially increasing the group's risk of insolvency. It would also be very bad for ITV's reputation if we were found to be doing business with a sanctioned country, company or individual in circumstances where it was not authorised or exempt under applicable laws.

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 (which includes sanctions)
• Before doing business that might involve a sanctioned country, company or individual:
  ○ Ask Legal & Business Affairs for guidance
  ○ Carry out due diligence - including **sanctions checks** - on all third parties and their owners
  ○ Include appropriate wording in contracts
• Notify the Insurance team before proceeding
• Escalate any questions or concerns to the Head of Corporate Compliance
	• Do business directly or indirectly with any sanctioned country, company or individual without asking Legal & Business Affairs for guidance first, and notifying the Insurance team
	• Delay due diligence: **sanctions checks** must be completed on all third parties and their owners before you proceed
	• Ignore red flags (e.g. unusual ownership structures; third party unwilling to provide ownership information or confirm its compliance with sanctions)

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**. ITV will not tolerate retaliation against individuals that raise reports made in good faith, and will take appropriate action where necessary.

Sanctions Policy

Policy Owner:
Mike Hirst, Group Finance Director
Chris Kennedy, CFO/COO
Ed Cotton, Head of Corporate Compliance
Policy Manager: Ed Cotton
Approver: ITV Risk Committee
Approval date: 29 April 2025

1. What are Sanctions?

Sanctions are trade or financial restrictions that are put in place by national governments or international bodies such as the EU or UN against target countries, entities, individuals, groups or industries. They are aimed at maintaining or restoring international peace and security by changing the behaviour of sanctioned parties through economic or diplomatic pressure and by addressing perceived threats to national security.

Typical measures include:

- embargoes on the supply of goods, technology, services or arms / military equipment and training;
- financial restrictions such as asset freezes on government officials or other entities or individuals, including prohibitions on transactions with them; and/or
- travel bans on named individuals.

ITV is committed to ensuring that all of its businesses comply with all applicable sanctions, including those imposed by the UK, US, EU, UN and the national governments of countries where ITV companies are located.

This Policy should be read in conjunction with ITV's policies on: Anti-Bribery & Corruption; Anti-Money Laundering, Counter-Terrorist Financing and Anti-Fraud; and the Prevention of Facilitation of Tax Evasion.

2. ITV's Obligations

In addition to a general obligation to comply with all applicable laws and regulations, ITV group companies are required to comply with all applicable sanctions regimes when doing business. It is also a strict requirement of the group's banking and financing arrangements. This means that no ITV group company is permitted to:

- be owned or controlled by a sanctioned entity or individual;
- be located, organised or resident in a sanctioned country; or
- do business <u>directly or indirectly</u> in or with any of the following, <u>unless the activity is authorised or exempt under applicable laws</u> (i.e. unless it is permitted under a sanctions licence or not prohibited by the particular sanctions in force):
    - any sanctioned country, individual, group or entity;
    - any business that is directly or indirectly owned or controlled by a sanctioned individual, group or entity;
    - any business that is established in a sanctioned country;

- any business that is operating or planning to operate in or from a sanctioned country; or
- any business that is operating or planning to operate in a sanctioned industry.

You might be dealing directly with a sanctioned country if you are:

- producing a programme in a sanctioned country;
- producing a programme using the services of individuals or entities located, organised or resident in a sanctioned country;
- entering into carriage agreements for the broadcast of ITV channels in a sanctioned country; or
- licensing a programme to or from a broadcaster or other company in a sanctioned country.

You might be dealing indirectly with a sanctioned country if you are:

- producing a programme using the services of individuals or entities (e.g. contractors) ordinarily located or resident in a sanctioned country but temporarily residing outside it;
- licensing a programme to a licensee in a non-sanctioned country on terms that allow the licensee to broadcast into a sanctioned country; or
- licensing a programme for broadcast into a non-sanctioned country, where the broadcast footprint will be such that the content may be received in a neighbouring sanctioned country.

The above applies to all ITV group companies, regardless of where in the world they are located.

ITV will not participate in any transactions that could expose the company or its personnel to sanctions enforcement risk, or in any transactions designed or intended to evade applicable sanctions or facilitate sanctions violations.

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, agency staff and contractors, all of whom must comply fully with its requirements. Any known or suspected sanctions violations must be reported to the Head of Corporate Compliance.

3. Understanding the Legal Background and Sanctions Lists

The primary sanctions regimes applicable to ITV are those enacted by the UK, US, EU and UN. All group companies must comply with the requirements of these regimes as well as with any sanctions imposed by the national governments of the countries in which they are located.

For example, the UK implements a range of sanctions through regulations made under the Sanctions and Anti-Money Laundering Act 2018, which provides the main legal basis for the UK to impose, update and lift sanctions. Through its Office of Financial Sanctions

Implementation (OFSI), Office of Trade Sanctions Implementation (OTSI) and HM Treasury, the UK Government helps companies understand their sanctions obligations, monitors compliance and assesses suspected breaches. The UK Government can also issue licences to allow otherwise prohibited transactions to take place under certain circumstances.

There are equivalent laws and governmental bodies in other jurisdictions.

The UK, US, EU and UN maintain lists of sanctioned companies and individuals under their respective regimes, as well as information on the countries, activities and industries which are subject to sanctions. These resources are listed below:

UK	**Sanctions Regimes**	https://www.gov.uk/government/collections/uk-sanctions-regimes-under-the-sanctions-act
	Sanctions list (with search tool)	https://search-uk-sanctions-list.service.gov.uk/
US	**Sanctions Regimes**	https://ofac.treasury.gov/sanctions-programs-and-country-information
	Sanctions List (with search tool)	https://sanctionssearch.ofac.treas.gov/
	Consolidated Screening List (with search tool)	https://www.trade.gov/consolidated-screening-list
EU	**Sanctions Map (with search tool)**	https://www.sanctionsmap.eu/#/main
	Sanctions Tracker (with search tool)	https://data.europa.eu/apps/eusanctionstracker/
	Sanctions List	https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions
UN	**Sanctions List**	https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list

Sanctions can change quickly and so it is not possible for ITV to maintain an exhaustive list of all sanctioned companies, individuals and countries. <u>It is the responsibility of each business, with the help of its Legal & Business Affairs team, to check that the country, companies or individuals they wish to do business in or with are not sanctioned and do not risk putting ITV in breach of applicable sanctions</u>.

A list of countries currently sanctioned by the UK, US and/or EU is set out below. This list is subject to change at short notice so you must also consult the resources mentioned above. <u>If the company or individual you are proposing to deal with, or the business activity you are proposing to engage in, is likely to involve a sanctioned country in any way, you must consult with your Legal & Business Affairs team before proceeding so that they can advise you on whether the activity is permitted</u>.

Afghanistan	Iran	Saudi Arabia
Albania	Iraq	Serbia
Armenia	Kazakhstan	Somalia
Azerbaijan	Kosovo	South Sudan
Belarus	Kyrgyzstan	Sudan
Bosnia & Herzegovina	Latvia	Syria

Burundi	Lebanon	Tajikistan
Central African Republic	Libya	Turkmenistan
China	Mali	Tunisia
Cuba	Moldova	Turkey
Democratic Republic of Congo	Montenegro	Ukraine (Russian-occupied regions)
Ethiopia	Myanmar	Uzbekistan
Georgia	Nicaragua	Venezuela
Guatemala	Niger	Yemen
Guinea	North Korea	Zimbabwe
Guinea-Bissau	North Macedonia	
Haiti	Palestine (West Bank and Gaza Strip)	
Hong Kong	Russia	

4. What are the Consequences of Non-Compliance?

Non-compliance with sanctions is very serious: it may result in civil or criminal penalties and cause ITV to breach its banking and financing arrangements, materially increasing the group's risk of insolvency. It would also be very bad for ITV's reputation if we were found to be doing business in or with a sanctioned country, company or individual in circumstances where it was not authorised or exempt under applicable laws.

Individuals who do not comply with applicable sanctions or the requirements of this policy may also face civil and criminal liability as well as disciplinary action, up to and including dismissal or termination of their contract with ITV.

5. What do you need to do?

If you are considering doing business that could directly or indirectly involve a sanctioned country, company or individual (such as filming in Cuba, Iran, North Korea, Syria or Russia, or signing a licensing deal with a broadcaster for a region that includes a sanctioned country), then you must notify your Legal & Business Affairs team and also the Insurance team before proceeding. Similarly, if it is proposed that a transaction – such as a licence deal – will afford deferred payment terms to a customer who may be affected by sanctions to any extent, you must notify your Legal & Business Affairs team and the Insurance team before proceeding.

Your Legal & Business Affairs team will be able to help you by researching the sanctions legal position and advising you further. This assistance could include, for example, considering and advising on:

- the risk profile of the activity you wish to undertake and considering whether it is caught by applicable sanctions (e.g. sanctions might relate solely to an arms embargo and not relate to the activity you wish to conduct);
- if you are considering doing business with a third party, whether the third party is reputable and located in a reputable jurisdiction, such that it is more likely to be mindful of its sanctions obligations; and

- whether the agreement contains suitable representations and warranties designed to cover compliance with sanctions. As to this, please see below.

6. Third Parties, including Suppliers

When contracting with third parties, there is a risk that they could expose ITV to sanctions risk, for example by breaching sanctions themselves or by causing ITV to breach its sanctions obligations.

For higher risk / higher value suppliers (as defined in the Procurement policy), please engage the Procurement team to carry out pre-contract due diligence. For other types of third party, you must carry out pre-contract due diligence with the support of your Legal & Business Affairs team, including at contract renewal. This due diligence must include appropriate sanctions screening.

You must also include contractual protections in your agreements with suppliers or other third parties (please see below).

7. Contractual Protections

If a decision to proceed has been made, you should include suitable and sufficient warranties and representations in the deal documentation, including confirmation that the licensee, supplier or other contracting third party:

1. is not designated on a sanctions list or owned or controlled by any sanctioned person or entity;
2. is not located, organised, resident or ordinarily resident in (i.e. temporarily located or residing outside) a sanctioned country;
3. is not a government agency, authority, public body or state-owned enterprise of a sanctioned country; and
4. has not entered into and, throughout the term of the agreement, will not enter into any contractual or other business or financial relationship directly or indirectly with any person or entity meeting any of the descriptions in points 1 to 3 above.

You should also include a termination right and indemnity in the event of a breach of warranty by the contracting party. For international markets, ITV standard wording can be provided by the Director of Legal & Business Affairs, International Studios.

8. Training

ITV staff are required to complete all sanctions training assigned to them as part of mandatory training.

9. 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.

10. Speaking Up / Raising Concerns

If you have any concerns regarding any business activity or how this policy is being applied in practice, you can raise them through ITV's Speaking Up channels, contact your Director of Legal & Business Affairs or the Head of Corporate Compliance. ITV has a Speaking Up policy to help you raise any concerns in the right way (including anonymously, if you wish), which 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.

11. Questions

If you require further assistance then please seek advice from your Director of Legal & Business Affairs or the Head of Corporate Compliance. ITV also has arrangements with panel law firms who can provide further specialist advice in this area.

Review History

Version	Date	Author	Summary of changes
April 2025	29.04.25	Ed Cotton	Updates to wording and for alignment with legal requirements. Information on sanctions resources and sanctioned countries updated.
March 2026	03.03.26	Ed Cotton	Updates to list of sanctioned countries.