



CSR*

FOR BUSINESS GUIDELINES

Publicis Groupe expectations and commitments with its Business partners and providers

These CSR* Guidelines for Business (the “Guidelines”) outline the key-elements of Publicis Groupe and its agencies’ responsible procurement approach in dealing with its business partners, suppliers, their employees, agents and subcontractors (herein referred to as the “Business Partners”). The CSR for Business Guidelines are part of the Terms & Conditions in all Publicis Groupe contracts (art.12.9.3) signed with vendors and business partners. The Guidelines are complementary to the United Nations Global Compact 10 Principles (UNGC) and require our Business Partner’s commitment to the critical business behaviors described therein. These Guidelines follow French laws and regulations such as Sapin 2 Law (anti-corruption), Duty of Care Law (“devoir de vigilance”) and comply with the EU CSRD (Corporate Sustainability Reporting Directive) coming into force in 2025, and with the future EU CS3D (Corporate Sustainability Due Diligence Directive). These Guidelines are aligned with the company’s corporate business principles, explained in the Code of Ethics “Janus” with extracts that are public, and embracing a large number of topics.

Publicis Groupe Vendor Management Program is deploying a unique platform called ARIBA to get all of its suppliers registered centrally and where we update sensitive vendor information, including CSR.

Publicis Groupe and its agencies are asking their Business Partners to be compliant and vigilant regarding 17 items.

*CSR: Corporate Sustainability Responsibility, is equivalent to ESG: Environment, Social, Governance

1. CSR and ESG engagement

Publicis Groupe expects its Business Partners to be **an active member of a national or international CSR agreement or organization** (such as the United Nations Global Compact), and to be engaged in fighting against the critical challenges the world is facing such as human rights, labor practices and environmental issues. Business Partners **must comply with all applicable laws and regulations related to business and operations, including CSR and Sustainability**, applying self-regulatory standards and/or best practices wherever applicable. Business Partners must comply with the United Nations Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises.

2. Business Ethics – Social & Labor general principles

Publicis Groupe **Business Partners** will have to **comply with *Publicis Groupe's code of Ethics "Janus"* – as do our employees**, particularly on the following mandatory items:

- **Zero Tolerance regarding discrimination, harassment and workplace violence** and the respect of each individual, to build a safe and inclusive workplace, aligned with its **Diversity, Equality & Inclusion policy**.
- Publicis Groupe promotes **Diversity & Inclusion at large** as defined in its policy and expects its Business Partners to do the same, to ensure equal opportunities between all employees (gender equity training and skills development for all) with **specific attention to underrepresented groups**.
- Publicis Groupe promotes **safe labor** in respect of international labor rights as human rights, gender equality such as ILO International Labor standards including freedom of association and the right to collective bargaining.
 - Compliance with labor laws and regulations are mandatory, particularly those on **worker's protection** such as: age (e.g. majority), underage workers, labor contracts, adequate wage and equal pay for equal work, maximum working hours, time-off, social dialogue, work life balance, people security and safety at the workplace, health and well-being at work, aligned with our **HR General policies and rules**.
 - Fighting for Human rights at large and for Social Justice, **against modern slavery in all forms**, human trafficking, child and forced labor, undeclared work, and rejecting all forms of discrimination and harassment or violence is required from all providers and Business Partners.
 - In compliance with the French Law defining the **Duty of care** of Parent companies and subcontractors, and the EU CRSD asking them to prevent ESG risks (Environment, Social, Governance) related to their activities, Publicis Groupe is asking Business

Partners to comply with and be assessed by a third party on the highest standards related to Human rights and labor condition, health and security for people and environmental impacts.

3. Anti-corruption and Bribery and Money laundering

All forms of fraud, bribery and corruption, including any type of conflict of interest are strictly prohibited. In compliance with the French regulation Sapin 2, the United Kingdom BA (Bribery Act) and the US's FCPA (Foreign Corrupt Practice Act), Publicis Groupe promotes business integrity, fair trade and the respect of fair competition, aligned with its public **Anti-bribery and Anti-corruption policy**, Business Partners pledge to strictly comply with the applicable laws and standards in each country, particularly in terms of accounting, taxation and customs. Business Partners also pledge to exercise vigilance to ensure compliance with all applicable anti-money laundering laws.

4. Data Protection & Information Security

Publicis Groupe requires compliance with all applicable laws and regulations with regards to **intellectual property, data protection and privacy**, such as EU GDPR – General Data Protection Regulation or CPA – California Consumer Protection Act or similar, aligned with its **Data Privacy policy**.

Where applicable to the product or service, Groupe Security Office (GSO) teams conduct a technical review combined with tests (due diligence) on the security of suppliers' systems in order to verify their compliance and security, and alignment with **Information Security policy**. They validate the continuity plans proposed by suppliers. ISO 27001 certification might be required for some activities.

5. Environmental impacts

Due to the climate change emergency, Business Partners have to make their own efforts in their offers, particularly through **low carbon emissions' solutions (products & services) limiting drastically the use of natural resources and preserving biodiversity**, environmentally friendly technologies and operations, 'green' and eco-friendly products favoring the ones **from circular economy** and have to reduce greenhouse gas (GHG) emissions. Business Partners pledge to apply best practices in environmental protection, to protect nature and preserve natural resources (incl. water & marine ones), to maintain biodiversity and its ecosystems, to reduce waste and fight against all type of pollution.

6. Climate & Net Zero targets

Publicis Groupe requires Business Partners to commit

to environmental targets in line with the **Accord de Paris and its scenario 1.5°C** and aligned with its *Environmental Net Zero Climate Policy*.

Publicis Groupe Science-Based Targets (SBTi) are:

- 50% carbon reduction before 2030 in scopes 1+2+3, and the shift to 100% renewable energy by direct source before 2030,
- 90% carbon reduction before 2040 in scopes 1+2+3, and become Net Zero,

Publicis Groupe Business Partners are expected to have **validated targets to become Net Zero before 2050** as the United Nations and the European Union are requiring from all organizations.

Engagement in certified projects protecting biodiversity or compensating/removing carbon emissions should be done as a last resort. ISO 14001 certification might be required for some activities.

7. Accessibility & e-accessibility

At Publicis Groupe, we are committed to accessibility and expect our Business Partners to hold the same standard in both physical and digital world in order to provide *equal access to people with disabilities*. To maintain this commitment, we ask our Business Partners to conform to relevant accessibility standards, particularly the latest version of the Web Content Accessibility Guidelines (WCAG) level AA across all products, software and services provided to Publicis Groupe.

8. CSR assessment

All Publicis Groupe RFIs/RFPs strive to include a **mandatory CSR assessment**. This is a key-component of the company due-diligence process with third parties. The due-diligence process is composed by 5 elements. CSR assessment is one of the 5.

First step for all suppliers is to sign up through the Groupe proprietary platform P.A.S.S*; the results of the P.A.S.S. self-evaluation is transparent to the suppliers. Following this, Publicis Groupe expects strategic and Groupe suppliers to be assessed on CSR by an international independent third party like Ecovadis (or similar). This CSR assessment (via an independent third party or via P.A.S.S.) will count towards 20% of the Business Partner's overall proposal in Publicis Groupe RFPs.

9. Supplier diversity

Publicis Groupe works with many small and diverse suppliers and encourages **SMEs and diverse suppliers** to participate in RFIs/RFPs. Publicis Groupe defines a Diverse Supplier as any company 51%+ owned and operated by a person (or persons) in any of these categories: women, ethnic/ racial minority, veteran/service disabled, LGBT, and disabled

or diverse-abled. To engage with more diverse suppliers, Publicis Groupe is working with several third parties like Supplier.io and WeConnect. The company encourages proposals coming from the social economy, social entrepreneurs or part of the solidarity economy (incl. cooperatives, voluntary organizations or associations, charities, non-profit or foundations).

Publicis Groupe is partnering with WeConnect International – a global, corporate-led non-profit that facilitates inclusive and sustainable economic growth by empowering and connecting women business owners – as well as with UN Women through its EU-funded programme WE EMPOWER in G7 countries and the United Nations Women's Empowerment Principles (WEPs) secretariat.

10. Sustainable value chain

Sustainable procurement is a virtuous loop. Publicis Groupe expects its suppliers to integrate into their own processes *clear and quantified CSR commitments with their own partners* on social issues around human rights and fundamental freedoms, labor topics related to workplace and workforce health/safety; ethics and governance subjects; and climate targets aligned with the Paris Agreement and its 1.5°C scenario to reduce environmental and climate impacts, to act together for a more inclusive and sustainable world.

11. Confidentiality

Publicis Groupe keeps Business Partners **strategic, commercial, financial and technical information confidential**, and is asking for the same commitment from its Business Partners. In cases of subcontracting, if it is approved by Publicis Groupe, Business Partners will ensure that their own suppliers and subcontractors will commit in writing to the same requirements.

12. Business relations

Contract terms must be strictly respected by all parties, notably the quality of the products or services, the timeline for delivery, and the mutually agreed final costs. The goal is to encourage mutual respect and transparency about business concerns to mitigate potential risks. Conflicts of Interest should be avoided by all parties, as stated in the *Conflicts of Interests policy*. Publicis Groupe will respect the payment conditions established in the contract.

Publicis Groupe believes that an amicable agreement approach should be favored in case of dispute; if such amicable settlement agreement cannot be achieved, the dispute shall be referred to and finally resolved in the venue indicated the applicable contract executed by the Business Partner and the relevant Publicis Groupe's agency.

13. Economic relations

Publicis Groupe will monitor the **financial sustainability of suppliers to assess our weight** in the Business Partner's revenue and will pay attention if the Groupe reaches 25% of its yearly revenue, particularly for SMEs, to avoid economic dependency. In cases of terminating a long-term relationship with a Business Partner, a specific mutually agreed action plan shall be implemented (e.g. prepare termination, decrease volume progressively...) to **manage the exit phase** under applicable laws and regulations.

14. Compliance with competition rules

In a very **competitive environment**, Publicis Groupe is requiring from its Business Partners to:

- Conduct their activities in compliance with applicable competition laws and regulations in all countries where they operate,
- Not to request or transmit any information whose disclosure would constitute an infringement of competition law.

15. Audit Right

Publicis Groupe reserves the right to conduct at its own expense **sustainability compliance audits** of Business Partners to ensure their compliance with the Guidelines concerning human and labor rights, environmental and climate impacts, health and safety, and other related standards. Business Partners agree to permit, and use best efforts to facilitate access and conduct an inspection of the books, records and documentation with respect to its supply chain, during regular business hours, upon Publicis Groupe prior written notice of at least 30 business days.

16. Disclosure of incidents and Alert system

Business Partners shall disclose to Publicis Groupe any human rights issues and any incidents they become aware that occur within their organization to allow Publicis Groupe to prevent, mitigate or remediate negative impact on value chain workers that could result from its own operations. If the Business Partner, or, if a Publicis Groupe employee needs to report any misbehaviors, they can activate the *Publicis Groupe external whistleblowing system* at: <https://publicis.whispli.com/lp/ethicsconcerns>. These alerts are managed by the Groupe Compliance Department and the Publicis Groupe Secretary General, in a strictly confidential manner and, if acting in good faith, will ensure protection from any form of retaliation in compliance with applicable law.

In any cases of misconduct from the Business Partners, Publicis Groupe reserves the right, at its

sole discretion, to cease all business relationship with the Business Partners without any remedies, by all means permitted by law.

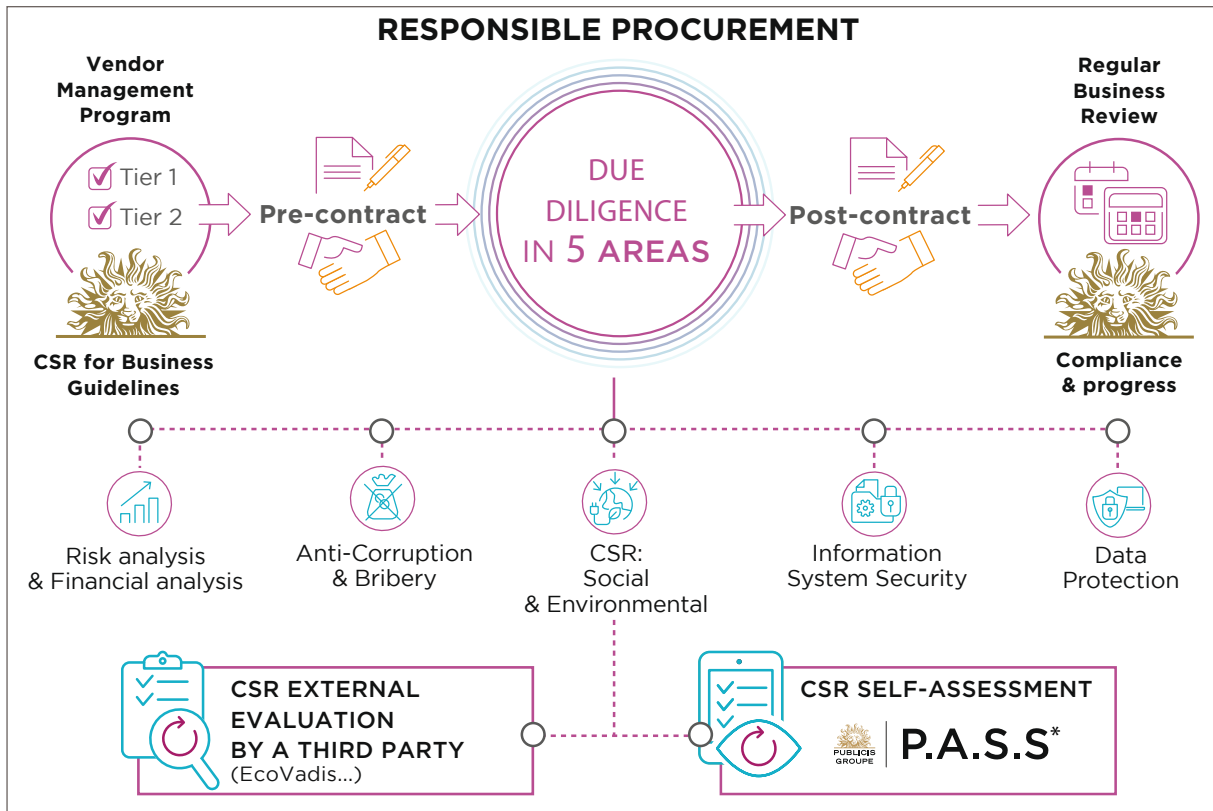
17. CSR joint efforts

To contribute to the global efforts around the **17 United Nations Sustainable Development Goals** (UN SDGs), when opportunities are identified then Business Partners are encouraged to work on some **common CSR activities with positive impacts** (and metrics) with Publicis Groupe. If joint projects are put in place, these CSR activities must be reviewed once per year to ensure a tangible impact.

Publicis Groupe launched in January 2023 *#WorkingWithCancer pledge*, to destigmatize cancer at work. The Company invites all providers, business partners and organizations to sign the pledge to provide a more supportive, and recovery-forward culture at work for people with cancer (or chronicle disease).

If a Business partner is not compliant with these CSR For Business Guidelines or some of its key-principles, it can be considered a non-selection criterion for Publicis Groupe RFIs/RFPs. The key principles set forth in these Guidelines form part of any Publicis Groupe general terms and conditions of purchase and are therefore deemed contractual obligations to which the Business Partners agrees to abide by. Business Partners acknowledge that respecting the principles set out in these Guidelines is an essential element of the commercial relationship with Publicis Groupe. In the event that a Business Partner is not or is no longer able to respect some of these key principles, it must inform Publicis Groupe immediately so that the corrective measures to be implemented can be agreed on together. Failure by the Business Partner to implement the mutually agreed corrective measures may constitute grounds for termination of the business relationship.

A sustainable supply chain is a virtuous circle that can help to build a better world: each player has to do its own part to make improvements, whatever and whenever we are; as a client or as a provider. In that respect, Publicis Groupe has been registered for many years as a supplier in Ecovadis and participates in the Carbon Disclosure Project (CDP) and others, whereby the Groupe is evaluated on an annual basis. Over 200 Publicis Groupe clients have access to these evaluations.



*P.A.S.S – Publicis Groupe Platform for Providers' self-Assessment for a Sustainable Supply-chain

What is it?

P.A.S.S is a proprietary platform gathering information from suppliers related to their CSR activities or products and services, inspired by GRI framework. This self-assessment under the supplier's responsibility will never replace an independent third-party evaluation. Publicis Groupe wants its supply chain members to be active in building a more inclusive and sustainable world through real action plans with KPIs. Each company is unique and the ways to tackle sustainability can vary between suppliers; Publicis Groupe truly respect providers' choices but wants its Business Partners to fight social and environmental challenges.

How is it working?

As a Groupe or agency supplier, you will be invited to join P.A.S.S for a CSR self-assessment. P.A.S.S content is transparent, and it is inspired from the 10 Principles of the UN Global Compact.

Based on around 80 key-questions, the goal is to assess supplier's engagement and actions in place on: CSR Strategic commitment, Social & Labor policies and practices, Anti-discrimination and equal policies, Training & development, Diversity & Inclusion, Work-Life Balance, Communities' activity, Ethics Principles, Anti-corruption & bribery, Data protection & privacy, Security & Business continuity, Environmental policy and priorities. Most of the answers must contain proof of evidence.

P.A.S.S will provide a score to the provider through a transparent process by the Groupe CSR Department. Suppliers will be asked to update their responses one time per year.

P.A.S.S assessment is required from all strategic business partners, global or local, and is free of charge.

Publicis Groupe joined the United Nations Global Compact in 2003, and signed the UN Women Empowerment Principles in 2017; in 2015 the Groupe adopted the United Nations Sustainable Development Goals (UN SDGs) by identifying 9 of them of which the company can contribute. This is part of the mandatory **Non-Financial Reporting**, publicly available.



The **United Nations Global Compact's** Ten Principles are derived from: the *Universal Declaration of Human Rights*, the *International Labor Organization's Declaration on Fundamental Principles and Rights at Work*, the *Rio Declaration on Environment and Development*, and the *United Nations Convention Against Corruption*.

HUMAN RIGHTS

Principle 1. Businesses should support and respect the protection of internationally proclaimed human rights; and
Principle 2. make sure that they are not complicit in human rights abuses.

LABOR

Principle 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
Principle 4. the elimination of all forms of forced and compulsory labor;
Principle 5. the effective abolition of child labor; and
Principle 6. the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7. Businesses should support a precautionary approach to environmental challenges;
Principle 8. undertake initiatives to promote greater environmental responsibility; and
Principle 9. encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10. Businesses should work against corruption in all its forms, including extortion and bribery.

