



## THE PUBLICIS WAY TO CONDUCT BUSINESS WITH INTEGRITY

# COMPETITION

### WHY?

Publicis Groupe believes in vigorous yet fair competition and conducts its operations in accordance with the principles of fair competition and all applicable regulations designed to fight anti-competition practices.

The risk is tangible, and the sanctions can amount up to 10% of the Groupe's worldwide yearly turnover for *each* case. The risk is all the more present as the authorities have increasing powers of investigation and technological means to identify breaches and as many cartels now collapse due to whistleblowing from one of the participants.

### FOR WHOM?

All employees and those working on behalf of the Groupe, its Countries or Business Units.

### WHAT?

We must not engage, directly or indirectly, in any form of cartels, anti-competitive agreements with competitors or business partners, with objectives such as sharing sensitive information, price-fixing, bid-rigging, coordinating or allocating bids, dividing or allocating markets, territories, clients or suppliers. If we end up holding a dominant position on certain markets, we must equally avoid abusing said position by restricting competition.

In particular, employees must not seek, receive, share nor use any sensitive information on competitors/ business partners such as:

- Pricing, margin, target margin, price and trade terms for services delivered, planned price increase, price structure, rebates, discounts.
- Cost price or other costs.
- Price or terms to be demanded from suppliers.
- Commercial strategy, marketing plans.
- List of clients.
- Contract terms and conditions.
- Innovation, research and development programs.

If inappropriate topics are raised or incidentally received during a contact with a competitor, a client, a supplier, a business partner, a former competitor's employee, or any other means, the receiver should object immediately and report to Legal.

Promptly seek advice from Legal in cases where you intend to collaborate with competitors (for example as part of a trade associations working group or for a specific project).

### WHO?

Country CEOs and CFOs and Business Unit CEOs and CFOs are responsible for compliance with this policy.