

# 05. Competition

## ▶ AT A GLANCE

- We compete fairly by respecting all competition regulations and practices.
- We don't engage in cartels or anti-competitive agreements with competitors or business partners.
- We must not seek, receive, share, or use sensitive and confidential information about competitors or business partners.

## FOR WHOM?

All employees and those working on behalf of the Groupe.

## WHAT?

- Publicis Groupe believes in vigorous but fair competition. It operates in full compliance with the principles of fair competition and all applicable regulations aimed to fight anti-competitive practices.
- The risk is tangible, and the sanctions can represent a significant percentage of the Groupe annual revenue for each case.

## HOW?

- The Groupe must not engage, directly or indirectly, in:
  - any form of cartel; or
  - 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 the Groupe ends up holding a dominant position in certain markets, it must equally avoid abusing that position by restricting competition.

- In particular, employees must not seek, receive, share or use any confidential information about competitors or business partners, including but not limited to:
  - pricing, margins, target margins, pricing and trading terms for services provided, planned price increases, price structures, rebates and discounts;
  - cost prices or other costs-related data;
  - prices or terms to be requested from suppliers;
  - commercial strategies, marketing plans;
  - clients list;
  - contract terms and conditions;
  - innovation, research and development programs.
- If inappropriate topics are raised or inadvertently received during contact with a competitor, client, supplier, business partner, former competitor's employee, or through any other means, the recipient must immediately object and report the matter to Legal.
- Promptly seek advice from Legal wherever you intend to collaborate with competitors (e.g., 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.

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Policy available to the public on the Groupe website.