



THE PUBLICIS WAY TO MANAGE INFORMATION

CONFIDENTIAL INFORMATION

WHY?

We need to protect confidential information of our clients, partners and the Groupe. Strict guidelines must be respected.

FOR WHOM?

All employees.

WHAT?

Key Executives and employees may have access to confidential information (i.e., information that is not part of the public domain) about the Groupe, its business, its clients, partners or suppliers.

For important rules regarding confidential information concerning the Groupe: please see section VI.5 on "Insider trading" and section VI.2 for "Financial Communications and Investor Relations".

Confidential information concerning clients, suppliers and business partners

In the normal course of business, clients, suppliers and other partners may make confidential information available to employees of the Groupe. Key Executives and all Groupe employees must not, under any circumstance, use such confidential information for their own personal interest or disclose it. Confidential information may only be used for legitimate business purposes in compliance with our contractual obligations to clients, suppliers and partners.

For certainty, confidential information of clients, suppliers and partners must not be disclosed inside or outside of the Groupe, unless there is specific written authorization for the disclosure. Disclosure of client, supplier or partner confidential information can be authorized only if, before the disclosure, the client, supplier or partner has authorized the specific disclosure in writing and that such disclosure does not result in the breach by the Groupe of any contractual obligations.

When developing a campaign for a client, we have access to confidential information regarding the product, its brand, launch dates, commercial or marketing objectives, etc. No one in our organization

has the right to disclose these pieces of information without the written authorization of the client. As it is customary in our business, campaigns are often supported by communication campaigns. We must be cautious and limit our comments to our work only.

When applicable law requires the release of confidential information, it is critical that, prior to the information being released, the client, supplier or business partner be made aware of such a requirement to the extent permitted by law and for all contractual obligations in connection with such disclosure to be complied with.

Any issue or concern regarding disclosure of confidential information should be reported to the Country lead counsel or the Groupe General Counsel.

WHO?

All employees. Country and Business Unit CEOs are responsible for compliance.