



## I. THE PUBLICIS WAY TO PROTECT OUR TALENT AND OUR ENVIRONMENT

# 4. REPORTING CONCERNS

### WHY?

We want to ensure that employees feel comfortable raising a Concern.

We comply with all compulsory laws in the countries where we work, and with our internal rules (Janus) when they are of a higher standard than local legislation.

All employees must behave with the highest level of ethics, and be respectful of the interests and reputations of our clients, our partners and our company.

### FOR WHOM?

All employees and those working on behalf of the Groupe, its Countries or Business Units, including third party representatives, suppliers and other business partners.

### WHAT?

This section is intended to inform employees and third parties as to how to report any good faith concern or alert ("Concern") regarding:

- violation of law
- fraud
- bribery or corruption
- harassment or discrimination
- other ethical concerns.

Please note that the Reporting Concerns procedures described below are not for use to report individual employee concerns relating to routine employment matters or grievances regarding company business decisions. Those concerns may be raised to your manager, local CFO or human resources (HR) representative.

### Confidentiality and Non-Retaliation

All Concerns reported will be treated confidentially. The identity of anyone raising a Concern, as well as the identity of anyone named in a Concern, will be protected, and the information provided will be used only as deemed necessary to investigate the Concern.

The Groupe will not, nor knowingly permit any employee to, retaliate in any way against (including any disciplinary action or dismissal) anyone raising a good faith Concern.

If a Concern is made in good faith and then later unsubstantiated, the identity of the person who raised the Concern, as well as the identity of the persons targeted by the Concern, will remain protected.

### Bad Faith Allegations

Using the Concern procedures to make malicious or untrue allegations, or to repeatedly target an employee unfairly, will be considered a violation of the Publicis Values and will be subject to employment action.

### HOW?

The Groupe encourages employees to report Concerns internally. Concerns should be reported directly to [ethicsconcerns@publicisgroupe.com](mailto:ethicsconcerns@publicisgroupe.com), and/or to the Secretary General of Publicis Groupe by email at [anne-gabrielle.heilbronner@publicisgroupe.com](mailto:anne-gabrielle.heilbronner@publicisgroupe.com). or by mail at Publicis Groupe, 133, avenue des Champs-Élysées, 75008 Paris, France.

Concerns sent to [ethicsconcerns@publicisgroupe.com](mailto:ethicsconcerns@publicisgroupe.com) are received only by the Secretary General of Publicis Groupe and Groupe VP Internal Audit & Risk Management. Under the direction of the Secretary General, all Concerns are reviewed and investigated in a strictly confidential manner and in accordance with this Policy.

Concerns should include all the relevant information to substantiate the Concern, as well as the contact information of the person raising the Concern. You may raise a Concern anonymously, but please be aware that our ability to investigate a Concern depends upon receiving sufficient detail regarding the Concern. Individuals raising a Concern should make a good faith effort to ensure the accuracy of the information reported. The individual reporting the Concern is welcome to submit any additional documents or information through the reporting lines even after the initial Concern has been submitted.

Concerns may be raised in any language.

### WHO?

All employees, particularly Business Unit and Country CEO's and CFO's and Groupe Secretary General.

## Investigation of a Concern

The Concern will be reviewed only by limited authorized personnel from any of Internal Audit, Legal or Human Resources to determine the appropriate steps for its assessment and investigation. If the Concern requires investigation, the investigation will be conducted by representatives of any of Internal Audit, Legal or Human Resources, or by external specialists, as appropriate. Our ability to investigate a Concern depends upon receiving sufficient detail regarding the Concern. Anonymous concerns, which do not include sufficient detail, will not be investigated.

The Concern will be shared internally and externally only as appropriate to conduct adequate assessment and investigation, in a strictly confidential manner, over a period proportional to the circumstances and complexities of the Concern.

The Groupe may refer the Concern to Country or Business Unit management if Country or Business Unit management is without conflict of interest and can best address the Concern.

If the Concern is determined to be well-founded, then the Groupe or Country or Business Unit management as appropriate will take action to address and remedy the Concern.

The Audit Committee will be informed regularly of the status of reported Concerns and how they are investigated and resolved.

### Timelines

The timeline for investigation will vary depending on the content and nature of the reported Concern. It is not possible, therefore, to predict accurately how long an investigation will take to be completed. Concerns will be responded to promptly. The individuals who raised the Concern will be notified that the Concern has been received within seven business days of receipt of the Concern.

Investigations will be carried out with appropriate attention to timely resolution. Within three months of the Acknowledgment, the individual who raised the Concern will be informed in writing of the actions taken to assess the validity of the Concern and when appropriate, information regarding how the Concern is being addressed.

The individual raising a Concern also will be informed when any relevant investigation is closed.

Options for reporting Concerns may vary in accordance with local law. All concerns may be reported in compliance with this Policy and/or local law.

### Time Limits for Storage of Personal Data

Any data related to a Concern shall be destroyed, stored or archived in accordance with applicable laws. If the Concern is not followed by legal or disciplinary proceedings, the data will be destroyed within two months of the end of the verification proceedings or archived. If the Concern is followed by legal or disciplinary proceedings, the data will be kept until the end of the legal or disciplinary proceedings or archived.

### Data Protection

This Reporting Concerns Policy and the methods for treating the Concerns will comply with applicable data privacy laws.

### Compliance with Local Laws

Options for reporting Concerns may vary in accordance with local law. All Concerns may be reported in compliance with this Policy and/or local law.